

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., ¹	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

**FOURTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPUCCIO & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF FEBRUARY 1, 2023 TO MAY 31, 2023**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

Name of Applicant:		Randall A. Pulman Pulman Cappuccio & Pullen, LLP
Applicant's professional role in case		Counsel for the Chapter 7 Trustee
Indicate whether this is an interim or final application		Interim
Date Order of Appointment filed		01/20/2022 [ECF No. 48]
Effective Date of Appointment		12/20/2021
	Beginning of Period	Ending of Period
Total period covered in application	02/01/2023	05/31/2023
Time periods covered by any prior applications	12/15/2021	01/31/2023

1 The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "**Bankruptcy Estate**" and collectively, "**Bankruptcy Estates**".

Total amounts awarded in all prior applications	\$861,073.08
Amount of retainer received in the case	\$0.00
Total amount of credits applied by PC&P to fees in all prior applications	\$38,320.00
Total fees applied for in the Fourth Fee Application and in all prior applications (including any retainer amounts or credits applied or to be applied)	\$1,043,430.00
Total fees applied for in the Fourth Fee Application (including any retainer amounts or credits to be applied)	\$232,556.50
Total professional hours covered by the Fourth Fee Application	1066.30
Reimbursable expenses sought in the Fourth Fee Application	\$8,544.81
Application Cost	Approximately \$10,000.00

TO THE HONORABLE MICHAEL M. PARKER, UNITED STATES BANKRUPTCY JUDGE:

Pulman, Cappuccio & Pullen, LLP (“**PC&P**”), attorneys for John Patrick Lowe, Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estates of deeproot Capital Management, LLC, Policy Services, Inc., Wizard Mode Media, LLC, deeproot Pinball LLC, deeproot Growth Runs Deep Fund, LLC, deeproot 575 Fund, LLC, deeproot 3 Year Bonus Income Debenture Fund, LLC, deeproot Bonus Growth 5 Year Debenture Fund, LLC, deeproot Tech LLC, deeproot Funds LLC, deeproot Studios LLC (each a “**Debtor**” and collectively, the “**Debtors**”), being jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523, hereby files this *Fourth Interim Application for Allowance of Hourly Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of February 1, 2023 to May 31, 2023* (“**Fourth Fee Application**”), for allowance of compensation of \$232,556.50 in fees and reimbursement of expenses of \$8,544.81, for a total of \$241,101.31, for the time period of February 1, 2023 to May 31, 2023. In support of the Fourth Fee Application, PC&P respectfully asks the Court to approve and authorize this Fourth Fee Application, based on the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Fourth Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue for this case is proper in the Western District of Texas under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. On December 9, 2021, (the “**Petition Date**”), the Debtors filed voluntary petitions under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”) [ECF No. 1]. The Court, by its Order entered December 21, 2021, authorized that the Debtors’ bankruptcy cases be jointly administered under lead case *In re: deeproot Capital Management, LLC*, Case No. 21-51523 (the “**Jointly Administered Case**”) [ECF No. 20].

3. On or about December 21, 2021, John Patrick Lowe was duly appointed as Trustee.

4. The statutory predicates for the relief sought by this Third Fee Application are sections 328(a) and 331 of the Bankruptcy Code.

5. A copy of the proposed order in conformity with Local Rule 9013 is attached as Exhibit A.

6. A copy of the Summary of the Fourth Fee Application is attached as Exhibit B.

II. FACTUAL AND PROCEDURAL BACKGROUND

7. The Debtors in this Jointly Administered Case are entities through which the Debtors’ principal, Mr. Robert Mueller (“**Mueller**”) ran a Ponzi scheme. Mueller controlled, as the sole owner, officer and director of each of the Debtors, all of their operations. Upon information and belief, Mueller raised, on behalf of the Debtors, in excess of \$70,000,000 from individual investors over the past decade.

8. Initially, Mueller raised monies from individual investors through Debtor, Policy Services, Inc. (“**PSI**”), by purportedly selling fractional interests in the death benefits payable on life insurance policies (the “**Policies**”) purchased by PSI. These fractional interests in the Policies are known as life settlements. *See Life Partners, Inc. v. Arnold*, 464 S.W.3d 660, 662 (Tex. 2015).

9. In or around 2015, Mueller stopped raising investor money directly through PSI and began to raise investor money primarily, though not exclusively, through two of the other Debtors, deeproot Growth Runs Deep Fund, LLC, and deeproot 575 Fund, LLC (the “**Funds**”). After Mueller switched to raising monies through the Funds, the investment pitch varied over time, but essentially investors were promised a guaranteed annual return of 5% to 7% payable at the end of the applicable investment period. Investors purchased debentures—or long-term unsecured obligations—to pay. Mueller marketed the Funds as having investments in life settlements, agriculture, real estate, and sports and entertainment businesses. In 2017, invested monies, by way of intercompany transfers to deeproot Pinball, LLC, deeproot Studios, LLC, deeproot Tech, LLC, and Wizard Mode Media, LLC, were used to support Mueller’s ultimately unsuccessful effort to develop and manufacture state of the art pinball machines. The Debtors’ pre-petition financial statements and each of the Debtors’ respective schedules reflect that none of the Debtors generated any net income and, in most cases, had no revenue at any time. Despite the lack of revenue and net income, the Debtors did return investments to some of the investors.

10. On or about August 20, 2021, the United States Securities and Exchange Commission (the “**SEC**”) filed suit² against Debtors Policy Services, Inc. and deeproot Funds, LLC, and Mueller individually, for violations of federal securities law, and named Mueller’s immediate family members, Jeffery L. Mueller and Belinda B. Breen, as relief parties (the “**SEC**

² *Securities and Exchange Commission v. Robert J. Mueller, et al.*, Civil Action No. 5:21-cv-785, U.S. Dist. Ct. for the W. Dist. Of Texas, San Antonio Division.

Civil Action”). An injunction was entered prohibiting the solicitation of additional funds. Shortly thereafter, on December 9, 2021, chapter 7 bankruptcy petitions were filed for each of the Debtors.

11. On January 20, 2022, the Court entered its *Order on the Application of Trustee to Employ Counsel* (the “**Employment Order**”), wherein the Court authorized the Trustee to employ PC&P as counsel [ECF No. 48]. The Employment Order permits PC&P to seek interim compensation as provided in 11 U.S.C. §331, subject to approval by this Court. A copy of the Employment Order is attached hereto as Exhibit C.

12. On May 13, 2022, PC&P filed its *First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, with the Court (“**First Fee Application**”). [ECF No. 111].

13. On June 9, 2022, the Court entered its *Order Granting First Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of December 15, 2021 to April 30, 2022*, authorizing the Trustee to pay to PC&P as an administrative expense, hourly fees in the amount of \$226,982.50 and expenses in the amount of \$28,952.54 from the Bankruptcy Estate accounts of the Debtors as designated in the Court’s Order. [ECF No. 125].

14. On October 31, 2022, PC&P filed its *Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022*, with the Court (“**Second Fee Application**”). [ECF No. 189].

15. On December 6, 2022, the Court entered its *Order Granting Second Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as*

Counsel to the Trustee for the Time Period of May 1, 2022 to September 30, 2022, authorizing the Trustee to pay to PC&P as an administrative expense, hourly fees in the amount of \$259,247.00 and expenses in the amount of \$6,145.75 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. [ECF No. 211].

16. On March 3, 2023, PC&P filed its *Third Interim Application for Allowance of Legal Fees and Expenses for Pullman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, with the Court ("**Third Fee Application**"). [ECF No. 260].

17. On April 6, 2023, the Court entered its *Order Granting in Part Third Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of October 1, 2022 to January 31, 2023*, authorizing the Trustee to pay to PC&P as an administrative expense, interim hourly fees in the amount of \$309,885.00 and expenses in the amount of \$29,860.29 from the Bankruptcy Estate accounts of the Debtors as designated in the Court's Order. The Court ordered that the amount of the fees for redacted time entries found in the detailed time descriptions attached to the Third Fee Application ("**Redacted Time Entries**") should be disallowed as the Court was then unable to assess the reasonableness and necessity of the services performed. The amount of the partial award of interim fees thus reflected PC&P's requested interim fees of \$324,644.00 less \$14,759.00, the amount of the Redacted Time Entries. The Court further ordered that its Order was without prejudice to PC&P in a subsequent application seeking recovery of the Redacted Time Entries. [ECF No. 272].

III. APPLICATION FOR HOURLY SERVICES

18. PC&P has provided legal services and expended 1066.30 hours from February 1,

2023 to May 31, 2023 (the “**Application Period**”), totaling \$232,556.50 in fees representing the Trustee. The average hourly rate for this fee application was \$218.10 per hour.

19. During this four month Application Period, lawyers from PC&P on behalf of the Trustee:

- a) Filed eight adversary complaints on avoidance actions against Finders and vendors in addition to the thirty-seven adversary complaints previously filed on avoidance actions against Finders and Net Winners;
- b) Brought suit against American Express to recover fraudulent transfers made by Debtor, Policy Services, Inc., to pay personal expenses charged by Robert Mueller;
- c) Brought suit against JP Morgan Chase to recover fraudulent transfers made by Debtor, Policy Services, Inc., to pay personal expenses charged by Robert Mueller;
- d) Negotiated settlements with Net Winners, Finders, vendors, and American Express recovering \$1,205,091.66 on behalf of the Estates as of May 31, 2023;
- e) Prepared and responded to pleadings and discovery requests in the numerous avoidance actions;
- f) Attended hearings and obtained default judgments against Net Winners and Finders; and
- g) Communicated and negotiated with attorneys for the United States Department of Justice and the Securities and Exchange Commission.

20. Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy Case by PC&P by matter number.

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$35,180.00	\$1,232.39	93.70
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$10,899.50	\$0.00	29.90
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00

1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$2,505.00	\$15.00	13.50
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$12,695.00	\$1,378.60	33.70
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$3,385.00	\$0.00	17.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$487.50	\$0.00	1.30
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$13,757.50	\$0.00	52.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$5,121.00	\$0.00	37.10
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$3,085.00	\$0.00	18.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$27.50	\$0.00	0.10
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$1,886.50	\$0.00	10.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$5,000.00	\$0.00	38.80
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,097.50	\$10.00	21.80
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,387.50	\$0.00	4.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,450.00	\$57.50	9.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,777.50	\$0.00	6.60
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$1,350.00	\$0.00	10.00
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$4,220.50	\$5.00	23.20
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$11,140.50	\$3,336.47	51.90
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$1,471.50	\$0.00	8.60
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,732.00	\$15.00	10.70

1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$6,172.50	\$0.00	17.70
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$4,095.50	\$130.00	25.80
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$3,480.50	\$5.00	23.50
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$2,632.50	\$5.00	19.50
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$3,616.50	\$0.00	24.60
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$3,239.50	\$0.00	23.60
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$5,068.50	\$5.00	29.60
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$4,271.00	\$5.00	24.70
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$3,673.00	\$5.00	24.80
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$5,493.00	\$5.00	36.90
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,015.00	\$40.00	5.90
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,682.50	\$0.00	11.60
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$4,985.50	\$22.00	24.20
1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$2,297.50	\$5.00	15.50
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$2,065.00	\$30.00	14.90
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$4,492.50	\$0.00	28.40
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$755.00	\$50.00	2.50

1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,342.50	\$0.00	14.40
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$5,748.50	\$0.00	24.90
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$1,355.00	\$0.00	7.50
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$357.50	\$0.00	1.30
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,514.50	\$0.00	9.90
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$0.00	9.40
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$352.50	\$0.00	1.20
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,667.50	\$0.00	12.90
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,810.50	\$0.00	19.00
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$2,983.50	\$0.00	21.20
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,817.50	\$0.00	14.40
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$6,467.50	\$1,837.85	22.70
1934.058	Luxor Financial Group Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	American Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$5,960.00	\$0.00	17.30
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$13,385.00	\$0.00	36.70
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$27.50	\$0.00	0.10
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$2,275.00	\$350.00	6.10
	Total:		\$232,556.50	\$8,544.81	1066.30

Attached hereto as Exhibit D-1 through D-62 are copies of billing invoices itemizing the fees incurred by PC&P in each of the sixty-two matters, by date and billing category.

A. Summary of Services Rendered in the Bankruptcy Case by Category
PC&P Matter Nos. 1934.001 – 1934.062

Category	Description	Hours	Amount
B110	Case Administration	57.4	\$6,314.00
B120	Asset Analysis and Recovery	35.6	\$16,040.00
B160	Fee/Employment Applications	81.8	\$31,075.00
B180	Avoidance Action Analysis	54.0	\$17,040.00
B190	Other Contested Matters (excluding assumption/rejection motions)	837.50	\$162,950.00
	Total:	1066.30	\$232,556.50

i. Case Administration (B110)

21. Services rendered in this category involved the management of all case related data, documents and files in the possession of PC&P. This includes the management and organization by PC&P paralegal staff of all data received by PC&P in digital form, discovered on Debtors' servers and data received from third parties, as well as the scanning and digitization of all paper documents and files discovered at Debtors' offices and received from third parties, for the purpose of allowing lawyers from PC&P to conduct efficient review and searches of all data, documents and files related to the Bankruptcy Case.

22. In addition, services rendered in this category include meetings and discussions amongst PC&P attorneys concerning case strategy, work flow, assignment of tasks, and legal research and analysis concerning the anticipated substantive consolidation of the jointly administered bankruptcy cases.

23. PC&P expended a total of 57.40 hours across all matters, which resulted in total charges of \$6,314.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-62.

ii. Asset Analysis and Recovery (B120)

24. Services rendered in this category include the investigation of assets, review of bank statements, credit card statements, investor files, finder files, e-mail communications, and other documents, and legal research regarding asset recovery. Lawyers at PC&P engaged in a substantial amount of investigation of the Debtors' financial records.

25. Lawyers with PC&P have analyzed the financial information and data on transfers by the Debtor entities to insiders, investors, net winners, finders and other third parties, for purposes of pursuing Title 11, Chapter 5 avoidance claims.

26. PC&P expended a total of 35.60 hours, which resulted in total charges of \$16,040.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-62.

iii. Fee/Employment Applications (B160)

27. Services rendered in this category involved drafting the Supplement to First Interim Fee Application for Allowance of Fees and Expenses for Greg T. Murray as Accountant to Trustee, the Second Interim Fee Application for Allowance of Fees and Expenses for Greg T. Murray as Accountant to Trustee, the Third Fee Application, and this Fourth Fee Application.

28. PC&P expended a total of 81.80 hours, which resulted in total charges of \$31,075.00 for services rendered in this project category, which amounts to approximately \$500.00 per matter in the Bankruptcy Case. The detailed time descriptions for this category are included in Exhibit D-1.

iv. Avoidance Action Analysis (B180)

29. Services rendered in this category involved review and analysis of the Debtors' investor records, finders' agreements, bank statements, and financial records, and legal research pertaining to the Texas Securities Act, fraudulent conveyance actions under 11 USC § 544, and the Texas Uniform Fraudulent Transfers Act.

30. Lawyers with PC&P have been reviewing data and analysis prepared by the Trustee's forensic account to identify net winners and finders, and have been preparing adversary case summaries and analysis for review by the Trustee in preparations for the drafting and filing of a substantial number of adversary actions.

31. PC&P expended a total of 54.00 hours, which resulted in total charges of \$17,040.00 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-62.

v. Other Contested Matters (excluding assumption/rejection motions) (B190)

32. Services rendered in this category involved the review and analysis of the Debtors' records to identify matters that may be contested for the benefit of the estate.

33. Lawyers with PC&P prepared adversary complaints, prepared and responded to discovery requests, prepared motions for default, attended hearings, communicated with opposing counsel, and engaged in settlement negotiations with Net Winners, Finders, vendors, and American Express.

34. PC&P expended a total of 837.50 hours, which resulted in total charges of \$162,087.5 for services rendered in this project category. The detailed time descriptions for this category are included in Exhibits D-1 through D-62.

B. Summary of Services Rendered in the Main Bankruptcy Case

i. **Matters Relating to Case Administration**

PC&P Matter No. 1934.001 (Estate: Policy Services, Inc., Case No. 21-51513)

35. Services rendered in this category by lawyers from PC&P involved the review and analysis of debtor data, documents and records in the possession of PC&P. The management and organization of all data received by PC&P, including documents and data received from third parties in connection with the Net Winner Matters and Finder Matters. Scanning and digitization of all paper documents and files discovered and received from third parties was performed by paralegal staff from PC&P for the purpose of providing lawyers from PC&P with an efficient means to search and review all data, records, documents and files related to the Bankruptcy Case.

36. Services rendered in this category also include meetings and discussions amongst PC&P attorneys concerning case strategy, work flow, assignment of tasks, and legal research and analysis.

37. PC&P expended a total of 57.40 hours on case administration in the main bankruptcy case, which resulted in charges of \$6,314.00 for services rendered in this matter. The detailed time descriptions for this matter are included in Exhibits D-1 – D-62.

ii. **Matters Relating to Fee/Employment Applications**

PC&P Matter No. 1934.001 (Estate: Policy Services, Inc., Case No. 21-51513)

38. Services rendered by lawyers from PC&P in this category involved drafting the the Supplement to First Interim Fee Application for Allowance of Fees and Expenses for Greg T. Murray as Accountant to Trustee, the Second Interim Fee Application for Allowance of Fees and Expenses for Greg T. Murray as Accountant to Trustee, the Third Fee Application, and this Fourth Fee Application.

39. PC&P expended a total of 81.80 hours on fee/employment applications in the main bankruptcy case, which resulted in total charges of \$31,075.00 for services rendered in this matter.

The detailed time descriptions for this matter are included in Exhibits D-1, D-2, D-7, D-8, D-11.

C. Matters Relating to the SEC

PC&P Matter No. 1934.002 (Estate: deeproot Funds, LLC, Case No. 21-51521)

40. Services rendered by lawyers from PC&P relating to the SEC and the SEC Case (the “**SEC Matter**”) include review and analysis of documents in connection with the waiver by Trustee of the attorney client privilege as proposed by the SEC, review and analysis of documents related to Debtor’s engagement of Carlile, Patchen & Murphy, LLP, attending the deposition of Robert Mueller conducted by the SEC, review and analysis of documents responsive to SEC requests for production, video and telephone conferences with SEC attorneys, review and analysis of proofs of claim filed by the SEC, telephone conferences with Robert Mueller’s counsel regarding mediation.

41. In connection with the SEC Matter, PC&P expended a total of 29.90 hours, which resulted in total charges of \$10,899.50. The detailed time descriptions for this matter are included in Exhibit D-2.

D. Matters relating to Robert J. Mueller

PC&P Matter No. 1934.007 (Estate: Policy Services, Inc., Case No. 21-51513)

42. This matter relates to Robert J. Mueller (the “**Mueller Matter**”), the principal of the Debtors, with respect to the adversary action brought by Trustee against Mr. Mueller in *Plaintiff’s Original Complaint* [ECF No. 1 (Adv. 22-05097)] against defendant, Mueller, filed by the Trustee on December 8, 2022, claiming damages in amounts ranging from \$3,000,000 to \$72,000,000 (the “**Mueller Complaint**”). Services rendered by lawyers from PC&P in connection with the Mueller Matter include the review and analysis of defendant’s initial disclosures, drafting plaintiff’s initial disclosures, review and analysis of Federal law enforcement subpoenas served upon Trustee in connection with the criminal investigation of Mueller, drafting

of demand letter to Mueller, drafting of requests for admission, legal research, settlement negotiations, review and analysis of motion to abate/transer, telephone conferences with Mueller's counsel, negotiation of agreed order on abatement, attending hearing on motion to abate.

43. In connection with the Mueller Matter, PC&P expended a total of 33.70 hours, which resulted in total charges of \$12,695.00. The detailed time descriptions for this matter are included in Exhibit D-7.

E. Matters Relating to Adversary Proceedings - Net Winners

PC&P Matter Nos. 1934.006, 1934.008, 1934.013, 1934.014, 1934.018, 1934.019, 1934.020 (Estate: Policy Services, Inc., Case No. 21-51513)

44. These matters (the “**Net Winner Matters**”) concern adversary proceedings brought by the Trustee against those investors who are what the law describes as net winners (i.e. investors who were returned the principal amount of their investment and who also received a return on that investment in the form of interest payments, dividends, etc.). The Debtors’ records reflect that there were 6 net winners, with a total of \$566,163.47 of transfers potentially recoverable to the Estates under 11 U.S.C. §§ 548 and 544 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

45. Services rendered by lawyers from PC&P relating to the Net Winner Matters, include the negotiation and drafting of settlement agreements, drafting requests for the clerk’s entry of default, drafting motions for entry of default judgment, appearing for and attending default hearings, preparation of post judgement discovery requests, drafting Rule 9019 motions.

46. As of May 31, 2023, lawyers from PC&P negotiated settlements in five of the Net Winner Matters and were granted a default judgment in the sixth, recovering a total of \$422,564.47, or approximately 75% of the total amount of transfers potentially recoverable to the Estates.

47. In connection with the Net Winner Matters, PC&P expended a total of 69.3 hours, which resulted in total charges of \$13,617.50. The detailed time descriptions for these matters are included in Exhibits D-6, D-8, D-13, D-14, D-18, D-19, and D-20.

F. Matters Relating to Adversary Proceeding – Finders

PC&P Matter No. 1934.011, 1934.012, 1934.015, 1934.016, 1934.017, 1934.021-1934.056 (Estate: Policy Services, Inc.)

48. These matters (the “**Finders Matters**”) concern thirty-three (33) adversary proceedings brought by the Trustee against those individuals and companies who are referred to in Debtors’ records as finders (the “**Finders**”) to recover commissions paid by Debtor, Policy Services, Inc., totalling approximately \$6,133,804.49. The Finders are individuals and companies (primarily investment advisers or insurance agents/agencies) who contracted with Debtors to find individual investors willing to invest in one or more of the deeproot investment funds. The Finders received commissions from the Debtors based on the amount of funds invested by the individual investors in the deeproot Funds. These commissions constitute avoidable transfers recoverable by the Trustee under 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act).

49. As of May 31, 2023, lawyers from PC&P successfully negotiated settlements with individual defendants in six Finders Matters (PC&P Matter Nos. 1934.023, 1934.029, 1934.039, 1934.046, 1934.051), recovering a total of \$132,527.19, and obtained default judgments in three Finders Matters (PC&P Matter Nos. 1934.032, 1934.028, and 1934.022) in the total amount of \$968,459.96. Motions for default are currently pending in nine Finders Matters (PC&P Matter Nos. 1934.017, 1934.025, 1934.027, 1934.033, 1934.034, 1934.039, 1934.042, 1934.043, and 1934.055) for claims in the total amount of \$790,257.86.

50. Services rendered by lawyers from PC&P relating to the Finders Matters, include the negotiation and drafting of settlement agreements, drafting requests for the clerk's entry of default, drafting motions for entry of default judgment, appearing for and attending default hearings, preparation of post judgement discovery requests, and drafting Rule 9019 motions.

51. In connection with the Finders Matters, PC&P expended a total of 755.50 hours, which resulted in total charges of \$131,562.00. The detailed descriptions of these matters are included in Exhibits D-11, D-12, D-15 – D-17, D-21 – D-56.

G. Matters Relating to G-Force

PC&P Matter No. 1934.057 (Estate: deeproot Tech, LLC)

52. This matter concerns a default judgment obtained by Debtor, deeproot Tech, LLC against G-Force Technical, Ltd., which was entered September 21, 2021, in the lawsuit styled and numbered *deeproot Tech, LLC v. G-Force Technical, Ltd.*; Cause No. 2019-CI-122367, filed in the 225th Judicial District Court of Bexar County, Texas (the “**G-Force Matter**”).

53. The default judgment entered in favor of deeproot Tech, LLC, is in the amount of \$90,934.30 for damages, \$38,800.00 for attorney's fees, \$515.36 of court costs, and post-judgment interest on the total sum at the annual rate of 5% from the date of judgment until paid.

54. Lawyers from PC&P prepared post-judgment requests for production and interrogatories, reviewed discovery, prepared for and conducted a Rule 2004 examination of the company's principal, and communicated with the Trustee concerning the liquidation of the defendant's equipment to satisfy the default judgment discussed above.

55. In connection with the G-Force Matter, PC&P expended a total of 22.70 hours, which resulted in total charges of \$6,467.50. The detailed description of this matter is included in Exhibit D-57.

H. Matters Relating to American Express Company

PC&P Matter No. 1934.059 (Estate: Policy Services, Inc.)

56. This matter concerns an adversary proceeding brought by the Trustee against the American Express Company, pursuant to 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act), seeking to avoid fraudulent transfers in the total amount of \$1,533,308.77.³ (the “**American Express Matter**”).

57. As is detailed in the Mueller Complaint, Mueller used approximately \$2.1 million from the Debtors’ bank accounts to pay many personal expenses (the “**Mueller Transfers**”). From December 10, 2014 to June 7, 2019, approximately \$1,533,308.77 of the Mueller Transfers were charged by Mueller to an American Express Business Gold Rewards Card (the “**AmEx Card**”), issued to Robert J. Mueller, National Wealth Solutions, LLC (an inactive Texas limited liability company, owned by Mueller, which was at no time affiliated in any way with Policy Services or any of the deeproot entities). According to the Debtors’ records, Mueller paid American Express for the personal expenses he charged to the AmEx Card using Debtor, Policy Services’ bank accounts. Such payments constitute a transfer of Debtor, Policy Services’ interest in property for which Policy Services received nothing of value.

58. Lawyers from PC&P drafted initial disclosures, responded to document requests, engaged in settlement negotiations, and drafted the settlement agreement and Rule 9019 Motion. The successful settlement of the American Express Matter recovered a total of \$650,000.00 to the Estate.

59. In connection with the American Express Matter, PC&P expended a total of 17.30 hours, which resulted in total charges of \$5,960.00. The detailed description of this matter is included in Exhibit D-59.

³ See, *John Patrick Lowe, Chapter 7 Trustee for the Bankruptcy Estate of deeproot Capital Mgmt. LLC, et al. v. American Express Co.*, Adv. Proc. No. 22-05098, filed December 8, 2022 [ECF No. 1].

I. Matters Relating to TuYo v. Transamerica Life Insurance Company
PC&P Matter No. 1934.060 (Estate: Policy Services, Inc.)

60. This matter (the “**Transamerica Matter**”) concerns a lawsuit brought by TuYo Holdings, LLC (“**TuYo**”), against Transamerica Life Insurance Company (“**Transamerica**”).⁴ TuYo was the purchaser, pursuant to that certain Life Insurance Policy Purchase and Sale Agreement (the “**Purchase Agreement**”), of the in-force and lapsed life insurance policies owned by the Estate of Policy Services, Inc., as authorized by the Court pursuant to its *Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363(b) and (f)*. [ECF No. 103]. The Transamerica lawsuit concerns one of the lapsed life insurance policies purchased by TuYo pursuant to the Purchase Agreement, which policy was issued by Transamerica, insuring the life of a Mr. Barry Siegel for \$1,500,000.00 (the “**Siegel Policy**”).

61. As alleged in the complaint, Mr. Siegel passed away on December 24, 2022. On March 10, 2023, TuYo made a formal claim to Transamerica to acknowledge it as the owner of the Siegel Policy and to pay the life insurance proceeds of \$1.5 million to TuYo. On March 24, 2023, Transamerica rejected the claim stating the Siegel Policy had lapsed. TuYo has alleged that Transamerica wrongly terminated the Siegel Policy, has refused to reinstate the Siegel Policy, and has refused to pay the \$1.5 million death benefit.

62. Pursuant to the Purchase Agreement, in addition to the purchase price, TuYo agreed to remit to Trustee fifty percent (50%) of the net insurance benefits resulting from the successful reinstatement of a lapsed policy. As the Purchase Agreement identified the Siegel Policy as a lapsed policy, should TuYo prevail in the Transamerica Lawsuit and be paid the \$1.5 million death

⁴ See, *TuYo Holdings, LLC, v. Transamerica Life Insurance Company*, Civil Action No. 5:22-00845-DAE (W.D. Tex) (the “**Transamerica Lawsuit**”).

benefit, or some portion thereof, Trustee is entitled to receive an amount equal to fifty percent (50%) of the amount of the insurance benefit received by TuYo, minus TuYo's reimbursable expenses, as such are defined in the Purchase Agreement.

63. In connection with the Transamerica Lawsuit, Transamerica served the Trustee with a *Subpoena to Produce Documents* (the "**Subpoena**"), requesting the Trustee produce documents related to the Siegel Policy.

64. Lawyers from PC&P reviewed and analyzed the subpoena, reviewed Debtors' files for documents responsive to Transamerica's requests for production, reviewed responsive documents for privilege, and drafted objections and responses to Transamerica's requests for production contained within the Subpoena.

65. In connection with the Transamerica Matter, PC&P expended a total of 36.70 hours, which resulted in total charges of \$13,385.00. The detailed description of this matter is included in Exhibit D-60.

J. Matters Relating to JP Morgan Chase
PC&P Matter No. 1934.062 (Estate: Policy Services, Inc.)

66. This matter concerns an adversary proceeding brought by the Trustee against the JP Morgan Chase Bank, N.A. ("**Chase Bank**"), pursuant to 11 U.S.C. §§ 548, 544, 550 (and applicable provisions of the Texas Uniform Fraudulent Transfer Act), seeking to avoid fraudulent transfers in the total amount of \$177,758.40.⁵ (the "**Chase Matter**").

67. As detailed in the complaint, from August 12, 2019 to January 12, 2021, \$177,758.40 of the Mueller Transfers were charged by Mueller to a Chase Bank Southwest Rapid Rewards Card, issued to Mueller (the "**Chase Bank Card**"). Mueller paid Chase Bank for the

⁵ See, *John Patrick Lowe, Chapter 7 Trustee for the Bankruptcy Estate of deeproot Capital Mgmt. LLC, et al. v. JP Morgan Chase Bank, N.A.*, Adv. Proc. No. 23-05037, filed April 20, 2023 [ECF No. 1].

personal expenses charged to the Chase Bank Card using Debtor, Policy Services' bank accounts. Policy Services received nothing of value in return for the payments made to Chase Bank from Policy Services' bank accounts.

68. Lawyers from PC&P drafted the adversary complaint, reviewed Chase Bank's motion to dismiss, and conducted legal research.

69. In connection with the Chase Matter, PC&P expended a total of 6.10 hours, which resulted in total charges of \$2,275.00. The detailed description of this matter is included in Exhibit D-62.

K. Reimbursement of Expenses

70. PC&P also files this Fourth Fee Application seeking reimbursement of the reasonable out-of-pocket expenses incurred during the Application Period, in the amount of \$8,544.81. The total expenses incurred by matter are included on the chart found in paragraph 20, above. An itemization report of the expenses incurred by matter is provided in each of Exhibits D-1 through D-62. All expenses for which compensation is requested by PC&P were incurred for and on behalf of the Trustee, and not on behalf of any committee, creditor, or other person.

L. Allocation of Fees by Matter.

71. Trustees' counsel has allocated the time expenses by the matters discussed above. For the most part, legal fees and expenses associated with a particular estate are allocated to that estate. For example, fees and expenses associated with adversary proceedings brought against Finders are allocated to the estate of Policy Services, Inc., as the monies received by Finders were paid from Policy Services' bank accounts; fees and expenses associated with adversary proceedings brought against Net Winners are allocated to the estate of deeproot Funds, LLC, as the monies received by Net Winners were paid from deeproot Funds, LLC's bank accounts; and

fees and expenses related to general case administration matters are allocated to Policy Services, Inc.

72. This is the Fourth Fee Application for fees and expenses filed by PC&P. This Fourth Fee Application requests approval of interim fees in the amount of \$232,556.50 and interim expenses in the amount of \$8,544.81, for a total allowed amount of \$241,101.31 in interim hourly fees and expenses.

IV. Authorities and Argument

73. The statutory predicates for the relief sought by this Third Fee Application are §§ 328(a) and 330 of the Bankruptcy Code.

74. Bankruptcy Code § 330(a) provides that in determining the amount of reasonable compensation to be awarded, a Court shall consider the nature, the extent, and the value of the services rendered by the professional, while taking into account the relevant factors, including the following:

- The time spent on such services;
- The rates charged for such services;
- Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered, toward the completion of the chapter 11 case;
- Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issues or task addressed;
- With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than chapter 11 cases.

11 U.S.C. § 330(a)(3). *See also Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d Cir. 1994) (noting Bankruptcy Code's policy of providing adequate compensation and stating that "Congress

rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.”) (citation and internal quotation marks omitted). *see also In re Woerner*, 783 F.3d 266, 274 (5th Cir. 2015) (“[Section 330] permits a court to compensate an attorney not only for activities that were ‘necessary,’ but also for good gambles—that is, services that were objectively reasonable at the time they were made—even when those gambles do not produce an ‘identifiable, tangible, and material benefit.’”) (citations and internal quotation marks omitted); *see also In re Pilgrim’s Pride Corp.*, 690 F.3d 650 (5th Cir. 2012) (reaffirming that bankruptcy courts have discretion to enhance professional fees in extraordinary cases).

75. The fees incurred by PC&P in representing the Trustee were reasonable and necessary for the administration of the Bankruptcy Case. As reflected in the attached Exhibits D-1 through D-62, PC&P has avoided unnecessary additional legal services and duplication of effort while striving to ensure the highest quality of legal representation.

76. The fees incurred by PC&P were for reasonable and necessary legal work that does not fall within the scope of the Trustee’s administrative duties. *See In re: Sharon Sylvester*, 23 F.4th 543, 548 (5th Cir. 2022).

77. PC&P performed these services within a reasonable period of time by professionals that have significant experience in bankruptcy cases. The rates charged by PC&P for this matter are comparable to the rates charged by PC&P in non-bankruptcy matters.

78. The PC&P professionals who have worked on this case during the Application Period are:

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Third Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	91.0	\$41,800.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	38.8	\$16,830.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	120.4	\$35,250.00
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	219.8	\$59,427.50
PARA-3		\$110.00	57.4	\$5,874.00
Gaurav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	517.2	\$51,720.00
Marshall Swanson	Nov. 6, 2015	\$275.00	21.7	\$5,967.50
		Total:	1066.3	\$232,556.50

PC&P has met the requirements of § 330(a) of the Bankruptcy Code, and the Court should award the fees and expenses sought in the Third Fee Application.

79. The out-of-pocket expenses incurred by PC&P have been billed only for expenses actually incurred by PC&P. Accordingly, charges for expenses such as courier fees, filing fees, outside copy service, parking, travel, postage, meals, charges for public records and transcription services are billed at the actual cost to PC&P. PC&P is generally billed a flat monthly fee for legal research through Westlaw, and such charges are allocated based on actual usage to PC&P's clients.

80. PC&P submits that this Fourth Fee Application complies with §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the United States Trustee Guidelines.

81. Detailed applications for compensation are required by the Bankruptcy Code, Local Rules, and applicable case law. This Fourth Fee Application has served the additional purpose of informing the Court and the creditors of the status of the case and the activities of the attorneys involved. The time spent preparing the Fourth Fee Application is compensable. *See* 11 U.S.C. § 330(a)(6).

82. The Trustee has reviewed this Fourth Fee Application and has approved the requested amounts and the allocation thereof.

WHEREFORE, PC&P prays that upon consideration hereof, this Court enter an Order (i) approving PC&P's request for interim fees in the amount of \$232,556.50 in fees and \$8,544.81 in related expenses, for a total of \$241,101.31, (ii) authorizing the Trustee to immediately pay PC&P from the appropriate Estate Account the allowed amount of \$241,963.81 for the fees and expenses that have been incurred to date, and (iii) granting such other and further relief as the Court finds appropriate to grant.

Respectfully submitted,

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**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY
ADMINISTERED BANKRUPTCY ESTATE OF
DEEPROOT CAPITAL MANAGEMENT, LLC,
ET AL.**

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of July, 2023, I electronically filed the foregoing document using the CM/ECF system, which will serve the document on the following list of parties in interest and parties requesting notice. A copy of the notice/summary of the Fourth Interim Fee Application will be mailed via US First Class Mail to the parties on the limited service list in this case, and a supplemental certificate of service will be filed to evidence compliance.

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Policy Services, Inc.
deeproot Pinball, LLC
deeproot Growth Runs Deep Fund, LLC
deeproot 575 Fund, LLC
deeproot 3 Year Bonus Income Fund, LLC
deeproot BonusGrowth 5 Year Debenture Fund, LLC
deeproot Tech, LLC
deeproot Funds, LLC
deeproot Studios, LLC
deeproot Capital Management, LLC
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/s/ Randall A. Pulman

Randall A. Pulman

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL., ¹	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

**ORDER GRANTING
FOURTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPuccio & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF FEBRUARY 1, 2023 TO MAY 31, 2023**

Came on for consideration the *Fourth Interim Application for Allowance of Legal Fees and Expenses for Pulman, Cappuccio & Pullen, LLP, as Counsel to the Trustee for the Time Period of February 1, 2023 to May 31, 2023* (“**Third Interim Application**”). The Court has considered

¹ The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

the Fourth Interim Application and finds that the fees and expenses represent reasonable compensation for actual and necessary services, and reimbursement for actual, necessary expenses. After considering the pleadings, the Court also finds that (i) it has jurisdiction over the matters raised in the Third Interim Application pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) proper and adequate notice of the Third Interim Application has been given and that no other or further notice is necessary; (iv) all objections to the Fourth Interim Application have been resolved by this Order or are overruled in their entirety; and (v) upon the record herein after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein.

IT IS THEREFORE ORDERED that the Fourth Interim Application pursuant to 11 U.S.C. § 330 is hereby **GRANTED**;

IT IS FURTHER ORDERED that the fees in connection with the legal services described in the Fourth Interim Application are allowed. All interim fees in the amount of \$232,556.50 and all expenses in the amount of \$8,544.81, for the allowance of a total of \$241,101.31 in hourly fees and costs, shall be an administrative expense of the respective Bankruptcy Estates² as outlined in the Fourth Interim Application.

IT IS FURTHER ORDERED the Trustee is authorized to immediately pay PC&P in connection with the hourly services provided, fees and expenses totaling \$241,101.31 from the specific Bankruptcy Estate accounts, as designated in the chart attached hereto as Exhibit 1.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

² Capitalized terms shall have the meaning ascribed to them in the Fourth Interim Application.

Submitted by:

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**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED
BANKRUPTCY ESTATES OF DEEPROOT CAPITAL
MANAGEMENT, LLC, *ET AL.***

EXHIBIT 1

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$35,180.00	\$1,232.39	93.70
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$10,899.50	\$0.00	29.90
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$2,505.00	\$15.00	13.50
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$12,695.00	\$1,378.60	33.70
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$3,385.00	\$0.00	17.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$487.50	\$0.00	1.30
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$13,757.50	\$0.00	52.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$5,121.00	\$0.00	37.10
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$3,085.00	\$0.00	18.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$27.50	\$0.00	0.10
1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$1,886.50	\$0.00	10.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$5,000.00	\$0.00	38.80
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,097.50	\$10.00	21.80
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,387.50	\$0.00	4.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,450.00	\$57.50	9.00

1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,777.50	\$0.00	6.60
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$1,350.00	\$0.00	10.00
1934.022	McNamara Cap. Investmt Grp Finder	Policy Services, Inc., Case No. 21-51513	\$4,220.50	\$5.00	23.20
1934.023	PGH Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$11,140.50	\$3,336.47	51.90
1934.024	Jacob Proux Finder	Policy Services, Inc., Case No. 21-51513	\$1,471.50	\$0.00	8.60
1934.025	John M Vizy Finder	Policy Services, Inc., Case No. 21-51513	\$1,732.00	\$15.00	10.70
1934.026	Mark Zabinski Finder	Policy Services, Inc., Case No. 21-51513	\$6,172.50	\$0.00	17.70
1934.027	CMB/Wiley Carter Finder	Policy Services, Inc., Case No. 21-51513	\$4,095.50	\$130.00	25.80
1934.028	Purpose Driven Fin. Servs. Finder	Policy Services, Inc., Case No. 21-51513	\$3,480.50	\$5.00	23.50
1934.029	Premier Group Enterpr. Finder	Policy Services, Inc., Case No. 21-51513	\$2,632.50	\$5.00	19.50
1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$3,616.50	\$0.00	24.60
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$3,239.50	\$0.00	23.60
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$5,068.50	\$5.00	29.60
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$4,271.00	\$5.00	24.70
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$3,673.00	\$5.00	24.80
1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$5,493.00	\$5.00	36.90
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,015.00	\$40.00	5.90
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,682.50	\$0.00	11.60
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$4,985.50	\$22.00	24.20

1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$2,297.50	\$5.00	15.50
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$2,065.00	\$30.00	14.90
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$4,492.50	\$0.00	28.40
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$755.00	\$50.00	2.50
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,342.50	\$0.00	14.40
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$5,748.50	\$0.00	24.90
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$1,355.00	\$0.00	7.50
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$357.50	\$0.00	1.30
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,514.50	\$0.00	9.90
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$0.00	9.40
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$352.50	\$0.00	1.20
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,667.50	\$0.00	12.90
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,810.50	\$0.00	19.00
1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$2,983.50	\$0.00	21.20
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,817.50	\$0.00	14.40
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$6,467.50	\$1,837.85	22.70
1934.058	Luxor Financial Group Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	American Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$5,960.00	\$0.00	17.30
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$13,385.00	\$0.00	36.70

1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$27.50	\$0.00	0.10
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$2,275.00	\$350.00	6.10
	Total:		\$232,556.50	\$8,544.81	1066.30

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL., ¹	§	BANKRUPTCY No. 21-51523-MMP
	§	LEAD CASE
DEBTORS.	§	JOINTLY ADMINISTERED

**NOTICE AND SUMMARY OF
FOURTH INTERIM APPLICATION FOR ALLOWANCE OF LEGAL FEES AND EXPENSES
FOR PULMAN, CAPPUCCIO & PULLEN, LLP, AS COUNSEL TO THE TRUSTEE
FOR THE TIME PERIOD OF FEBRUARY 1, 2023 TO MAY 31, 2023**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN
MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

- I. CLIENT: John Patrick Lowe, Chapter 7 Trustee
- II. REQUESTING APPLICATION / FIRM: Randall A. Pulman of Pulman, Cappuccio & Pullen, LLP, (“**PC&P**”) as counsel to the Trustee
- III. TOTAL AMOUNT OF INTERIM FEES AND COSTS REQUESTED: \$241,101.31
 - a. Fees: \$232,556.50
 - b. Expenses and Cost Advances (PC&P): \$8,544.81
 - d. Time period covered: 02/01/2023 – 05/31/2023

¹ The Jointly Administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”.

IV. BREAKOUT OF CURRENT APPLICATION

Name	Bar Admission Date	Rate	Hours expended on case	Fees requested in the Third Fee Application
Randall A. Pulman	Nov. 1, 1986	\$500.00	91.0	\$41,800.00
Leslie S. Hyman	Jun. 1, 1995	\$450.00	38.8	\$16,830.00
W. Drew Mallender	Oct. 1, 1992	\$375.00	120.4	\$35,250.00
Anna K. MacFarlane	Oct. 25, 2019	\$275.00	219.8	\$59,427.50
PARA-3		\$110.00	57.4	\$5,874.00
Gaurav Mankotia	Sept. 27, 2008 Bar Council of Delhi, India	\$100.00	517.2	\$51,720.00
Marshall Swanson	Nov. 6, 2015	\$275.00	21.7	\$5,967.50
		Total:	1063.2	\$232,556.50

MINIMUM FEE INCREMENTS: 0.1 HOURS

EXPENSES: \$8,544.81 (Filing Fees, Photocopying and Postage associated with providing notices to creditors)

AMOUNT ALLOCATED FOR PREPARATION OF THIS FEE APPLICATION: \$10,000.00

V. PRIOR APPLICATIONS: First Interim Fee Application, Second Interim Fee Application, and Third Interim Fee Application.

VI. OTHER CO-EQUAL OR ADMINISTRATIVE CLAIMANTS IN THIS CASE:

a. John Patrick Lowe, Chapter 7 Trustee (“Trustee”).

VII. RESULTS OBTAINED:

As reflected in the Fourth Interim Fee Application, PC&P has provided legal services and has obtained favorable results for the Bankruptcy Estates in connection with the services provided to the Bankruptcy Estates. Among other things, PC&P has: (1) negotiated favorable settlements of five of the Net Winners Matters and obtained a default judgement against the sixth Net Winner, recovering a total of \$422,564.47, or approximately 75% of the total amount of transfers potentially recoverable to the Estates; (2) communicated with SEC counsel, and attended the deposition of Robert Mueller conducted by the SEC; (3) in connection with the adversary action brought against Robert Mueller, drafted plaintiff’s initial disclosures, drafted a demand letter to Robert Mueller, drafted requests for admission, conducted settlement negotiations, and engaged in telephone conferences with Mueller’s counsel, negotiation of agreed order on abatement, attending hearing on motion to abate; (4) negotiated settlements with individual defendants in six of the adversary actions brought against Finders recovering a total of \$132,527.19, obtained default judgments in three adversary actions brought against Finders in the total amount of \$968,459.96; filed motions for default which are currently pending in nine adversary actions brought against Finders for claims in the total amount of \$790,257.86; (5)

obtained a default judgment against G-Force Technical, Ltd. in favor of deeproot Tech, LLC in the amount of \$90,934.30 for damages, \$38,800.00 for attorney's fees, \$515.36 of court costs, and post-judgment interest on the total sum at the annual rate of 5% from the date of judgment until paid; (6) settled the adversary action brought against American Express, recovering a total of \$650,000.00 to the Estate; (7) reviewed and analyzed the Debtor's financial records and bank statements, prepared and filed a complaint against JP Morgan Chase Bank for fraudulent transfers from the Estate of Policy Services, Inc. for charges to Mueller's personal credit card in the approximate amount of \$177,758.40.

Below is a chart summarizing fees, expenses and hours expended in the Bankruptcy Case by PC&P by matter number.

PC&P Matter No.	Matter Description	Debtor Estate	Fees	Expenses	Hours
1934.001	Main Bankruptcy Case	Policy Services, Inc. Case No. 21-51513	\$35,180.00	\$1,232.39	93.70
1934.002	SEC Matter	deeproot Funds, LLC, Case No. 21-51521	\$10,899.50	\$0.00	29.90
1934.003	CCW Matter	deeproot Funds, LLC, Case No. 21-51521	\$0.00	\$0.00	0.00
1934.004	Ohana Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.005	Cycladic Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.006	Jill R. Winn Net Winner	Policy Services, Inc., Case No. 21-51513	\$2,505.00	\$15.00	13.50
1934.007	Mueller Matter	Policy Services, Inc., Case No. 21-51513	\$12,695.00	\$1,378.60	33.70
1934.008	Net Winners Matter	Policy Services, Inc., Case No. 21-51513	\$3,385.00	\$0.00	17.00
1934.009	Nationwide Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.0
1934.010	Pinball Matter	deeproot Tech, LLC, Case No. 21-51520	\$487.50	\$0.00	1.30
1934.011	Finders Matter	Policy Services, Inc., Case No. 21-51513	\$13,757.50	\$0.00	52.70
1934.012	Financial Horizons Concepts Finder	Policy Services, Inc., Case No. 21-51513	\$5,121.00	\$0.00	37.10
1934.013	Kenneth & Brownie Martin Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$3,085.00	\$0.00	18.30
1934.014	David & Mary Medlang Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$27.50	\$0.00	0.10

1934.015	Financial Partners of America Finder	Policy Services, Inc., Case No. 21-51513	\$1,886.50	\$0.00	10.90
1934.016	INF Solutions LLC Finder	Policy Services, Inc., Case No. 21-51513	\$5,000.00	\$0.00	38.80
1934.017	GM Consultants Group Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,097.50	\$10.00	21.80
1934.018	Candice Gillen Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,387.50	\$0.00	4.80
1934.019	Alice Snell Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,450.00	\$57.50	9.00
1934.020	Carl & Paula Jarnecke/Trust Net Winner	deeproot Funds, LLC, Case No. 21-51521	\$1,777.50	\$0.00	6.60
1934.021	D. Stien/Fidelity Mutual Finder	Policy Services, Inc., Case No. 21-51513	\$1,350.00	\$0.00	10.00
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1934.030	Dennis Wirth, Agent Adv. Grp. Finder	Policy Services, Inc., Case No. 21-51513	\$3,616.50	\$0.00	24.60
1934.031	Michael Cales Finder	Policy Services, Inc., Case No. 21-51513	\$3,239.50	\$0.00	23.60
1934.032	George M Villa Finder	Policy Services, Inc., Case No. 21-51513	\$5,068.50	\$5.00	29.60
1934.033	Randy Seymour Finder	Policy Services, Inc., Case No. 21-51513	\$4,271.00	\$5.00	24.70
1934.034	Raul T Gomez Finder	Policy Services, Inc., Case No. 21-51513	\$3,673.00	\$5.00	24.80

1934.035	RD and J, Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$5,493.00	\$5.00	36.90
1934.036	David Rosen Finder	Policy Services, Inc., Case No. 21-51513	\$1,015.00	\$40.00	5.90
1934.037	Bob Patrick Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.038	Crissman Crombie Finder	Policy Services, Inc., Case No. 21-51513	\$1,682.50	\$0.00	11.60
1934.039	Agents Insur. Sales & Svv. Finder	Policy Services, Inc., Case No. 21-51513	\$4,985.50	\$22.00	24.20
1934.040	Hart Financial Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.041	Savings Options & Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.042	Shantell Wright Finder	Policy Services, Inc., Case No. 21-51513	\$2,297.50	\$5.00	15.50
1934.043	Steven Fortier Finder	Policy Services, Inc., Case No. 21-51513	\$2,065.00	\$30.00	14.90
1934.044	David Obman Finder	Policy Services, Inc., Case No. 21-51513	\$4,492.50	\$0.00	28.40
1934.045	Scott Nazarino Finder	Policy Services, Inc., Case No. 21-51513	\$755.00	\$50.00	2.50
1934.046	Senior Insurance Service Finder	Policy Services, Inc., Case No. 21-51513	\$2,342.50	\$0.00	14.40
1934.047	Safe Money Solutions Finder	Policy Services, Inc., Case No. 21-51513	\$5,748.50	\$0.00	24.90
1934.048	CWB Investment Advisors Finder	Policy Services, Inc., Case No. 21-51513	\$1,355.00	\$0.00	7.50
1934.049	Dianne McClish Finder	Policy Services, Inc., Case No. 21-51513	\$357.50	\$0.00	1.30
1934.050	Blanchard & Assoc. Finder	Policy Services, Inc., Case No. 21-51513	\$1,514.50	\$0.00	9.90
1934.051	Azar Parchami Finder	Policy Services, Inc., Case No. 21-51513	\$1,800.00	\$0.00	9.40
1934.052	Great Lakes Wealth Mgmt Finder	Policy Services, Inc., Case No. 21-51513	\$352.50	\$0.00	1.20
1934.053	Domonic Cotton Finder	Policy Services, Inc., Case No. 21-51513	\$1,667.50	\$0.00	12.90
1934.054	Flemming Financial Serv. Inc. Finder	Policy Services, Inc., Case No. 21-51513	\$3,810.50	\$0.00	19.00

1934.055	Gregory Talbot Finder	Policy Services, Inc., Case No. 21-51513	\$2,983.50	\$0.00	21.20
1934.056	Jack Nace Finder	Policy Services, Inc., Case No. 21-51513	\$1,817.50	\$0.00	14.40
1934.057	G-Force Technical Matter	Policy Services, Inc., Case No. 21-51513	\$6,467.50	\$1,837.85	22.70
1934.058	Luxor Financial Group Matter	Policy Services, Inc., Case No. 21-51513	\$0.00	\$0.00	0.00
1934.059	American Express Co. Matter	Policy Services, Inc., Case No. 21-51513	\$5,960.00	\$0.00	17.30
1934.060	TuYo v. Transamerica Life Matter	Policy Services, Inc., Case No. 21-51513	\$13,385.00	\$0.00	36.70
1934.061	Carlile, Patchen & Murphy Matter	Policy Services, Inc., Case No. 21-51513	\$27.50	\$0.00	0.10
1934.062	JP Morgan Chase Matter	Policy Services, Inc., Case No. 21-51513	\$2,275.00	\$350.00	6.10
	Total:		\$232,556.50	\$8,544.81	1066.30

Respectfully submitted,

PULMAN, CAPPUCCIO & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
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(210) 222-9494 Telephone
(210) 892-1610 Facsimile

By: /s/Randall A. Pulman
Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com

**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE**

EXHIBIT C



IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.

Dated: January 20, 2022.

A handwritten signature in black ink, appearing to read "Mike Parker", written over a horizontal line.

**MICHAEL M. PARKER
UNITED STATES BANKRUPTCY JUDGE**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523-MMP
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

ORDER ON THE APPLICATION OF TRUSTEE FOR AUTHORITY TO EMPLOY COUNSEL

Came on for consideration the *Application of Trustee for Authority to Employ Counsel* (the “**Application**”)¹ filed by John Patrick Lowe, the Chapter 7 Trustee (the “**Trustee**”) for the captioned jointly administered chapter 7 case. Based on the representations made in the Application and in the supporting *Affidavit of Randall A. Pulman in Support of the Application of Trustee for Authority to Employ Counsel*, the Court finds that (i) it has jurisdiction over the matters raised in the Application pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding

¹ Capitalized terms unless otherwise defined herein shall have the meaning as ascribed to them in the Application.

pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Application approving the employment of Pulman, Cappuccio & Pullen, LLP (“**PC&P**”) is in the best interest of the Estate and its creditors; (iv) PC&P holds no interest adverse to the Estate and is a disinterested person under 11 U.S.C. § 101(14); (v) proper and adequate notice of the Application has been given and no further notice is necessary; (vi) no objections to the Application have been filed; and (vii) based upon the record herein, after due deliberation, good and sufficient cause exists for the granting of the Application in all respects.

IT IS, THEREFORE, ORDERED that pursuant to section 327(a) of the Bankruptcy Code, the Trustee is authorized to employ PC&P with Randall A. Pulman to act as lead counsel to represent him as Trustee in this Case effective as of December 20, 2021, in accordance with the terms described in the Application, the engagement letter, and this Order, and to perform the services described below:

- a) to file pleadings with the court and to represent the Estate's interest in regard to any adversaries, appeals, or contested matters before this court and litigation in other courts, particularly with regard to the Estate's interest in various assets and the positions of secured and unsecured creditors, whether by motion, adversary action, turnover proceedings, or litigation activities of every description in other courts;
- b) to investigate, analyze, institute and prosecute actions regarding determination and recovery of property of the Estate, including investigation and prosecution of determination and lien perfection, avoidance litigation as well as collection and liquidation of assets of the Estate, to the extent such activities would be economically beneficial to the Estate;
- c) to assist the Trustee where necessary to negotiate and consummate non-routine sales or leases of the assets of the Estate, wherever they may be found, including sales free and clear of liens, claims and encumbrances, and to institute any necessary proceedings in regard thereto;
- d) to institute and prosecute non-routine objections to exemptions and non-routine objections to proofs of claim;
- e) to co-ordinate activities with the United States Trustee as appropriate in connection with issues of the integrity of the bankruptcy courts and procedures;

- f) to aid in the representation of the Trustee in any litigation against Trustee in Trustee's official capacity;
- g) to assist in resolution of sales of, and any title problems associated with, the Estate's property; and
- h) to collect any judgments that may be entered in favor of the Estate; and
- i) to assist in any other work requested by the Trustee.

IT IS FURTHER ORDERED that the Law Firm shall not be compensated by the bankruptcy Estate for performing duties required to be performed by the Trustee.

IT IS FURTHER ORDERED that if any supplemental declarations or affidavits are filed and served after entry of this Order, absent any objections within 21 days after the filing and service of such supplemental declarations or affidavits, PC&P's employment shall continue as authorized pursuant to this Order.

IT IS FURTHER ORDERED that PC&P shall be compensated upon appropriate application in accordance with Bankruptcy Code sections 330 and 331, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy of the Western District of Texas.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

###

SUBMITTED BY:

Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com

Anna K. MacFarlane
Texas State Bar No. 24116701
amacfarlane@pulmanlaw.com

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**PROPOSED ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY ADMINISTERED CASE
OF IN RE DEEPROOT CAPITAL MANAGEMENT, LLC ET AL.**

EXHIBIT D

EXHIBIT D-1

PULMAN, CAPPUCINO & PULLEN, LLP

Attorneys & Counselors

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 San Antonio, Texas 78213
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Lowe, Pat (dppt)
 Pat Lowe, Trustee
 2402 E. Main St.
 Uvalde, TX 78801

May 31, 2023

Invoice No. 236892
 Account No. 1934.001

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Deeproot - Policy Services, Inc. Case No. 21-51513, et al

Fees

				Rate	Hours	
02/01/2023	WDM B160	A103	Draft/revise Third Interim Fee Application	375.00	2.20	825.00
02/02/2023	WDM B160	A104	Review/analyze billing statements for accuracy and reasonableness.	375.00	1.80	675.00
02/06/2023	WDM B160	A104	Review/analyze third interim fee application billing statements/time entries for reasonableness and accuracy.	375.00	6.00	2,250.00
02/07/2023	WDM B160	A103	Draft/revise third interim fee application. Prepare spreadsheet analysis of fees and expenses.	375.00	3.80	1,425.00
02/08/2023	AKM B160	A101	Prepare summary chart of adversary proceedings for Third Interim Fee application.	275.00	2.00	550.00
	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	3.30	1,237.50
	WDM B160	A105	Communicate (in firm) with Anna MacFarlane regarding adversary proceedings, exhibit for fee application.	375.00	0.30	112.50
	WDM B160	A103	Draft/revise Third Interim Fee Application and Exhibits.	375.00	4.10	1,537.50
02/09/2023	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	5.20	1,950.00
02/10/2023	WDM B160	A103	Draft/revise Third Interim Fee			

Lowe, Pat (dprt)

Statement No. 236892

Account No 1934.001

Deeproot - Policy Services, Inc. Case No. 21-51513

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				Rate	Hours	
Application.				375.00	5.20	1,950.00
02/13/2023	AKM B190	A101	Office conference with Randall A. Pulman regarding fee application.	275.00	0.30	82.50
	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	5.10	1,912.50
	RAP B160	A104	Review of draft invoices; time and cost for third fee application.	500.00	2.00	1,000.00
02/14/2023	WDM B160	A105	Meeting with Randall A. Pulman regarding comments to fee application.	375.00	0.20	75.00
	RAP B160	A105	Meeting with W. Drew Mallender regarding comments to fee application.	500.00	0.20	100.00
02/15/2023	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	3.00	1,125.00
	RAP B160	A105	Meeting with W. Drew Mallender regarding comments to Fee Application	500.00	0.20	100.00
	WDM B160	A105	Meeting with Randall A. Pulman regarding comments to Fee Application.	375.00	0.20	75.00
02/16/2023	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	3.70	1,387.50
	WDM B160	A104	Review/analyze revised fee statements for accuracy and reasonableness. Meet with Randall A. Pulman regarding same. Meet with Jesslyn Delgado regarding revisions to fee statements.	375.00	1.50	562.50
	WDM B160	A103	Draft/revise Third Interim Fee Application	375.00	0.70	262.50
	RAP B120	A104	Telephone conference with P. Lowe regarding status of recoveries.	500.00	0.40	200.00
	RAP B160	A104	Review of draft of third fee application; edit of same; office conference with D. Mallender regarding same.	500.00	1.00	500.00
02/17/2023	WDM B160	A104	Prepare task code analysis and correct entries on fee statements.	375.00	0.70	262.50
02/20/2023	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	3.60	1,350.00

Lowe, Pat (dprt)

Statement No. 236892

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Deeproot - Policy Services, Inc. Case No. 21-51513

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				Rate	Hours	
02/21/2023	WDM B160	A103	Draft/revise Third Interim Fee Application.	375.00	5.70	2,137.50
	WDM B160	A103	Draft/revise Notice and Summary of Third Interim Fee Application.	375.00	1.40	525.00
02/22/2023	WDM B160	A103	Draft/revise Third Interim Fee Application, Exhibits, and Notice and Summary thereto.	375.00	2.20	825.00
02/24/2023	RAP B160	A109	Review of final draft of 3rd Fee Application; office conference with D. Mallender regarding same; forward to P. Lowe for review.	500.00	0.80	400.00
	WDM B160	A105	Meeting with Randall A. Pulman regarding Third Interim Fee Application.	375.00	0.20	75.00
02/27/2023	WDM B160	A103	Draft proposed Order for Third Interim Fee Application; office conference with Randall A. Pulman.	375.00	0.90	337.50
	RAP B190	A104	Review of draft of Third Fee Application; office conference with D. Mallender regarding same.	500.00	1.00	500.00
02/28/2023	WDM B160	A103	Prepare final revisions to Third Interim Fee Application, Notice and Summary, and proposed Order.	375.00	2.20	825.00
	RAP B190	A104	Review of draft of Third Fee Application for final approval; review of all interim invoices (d-1 through d-59) for reasonableness; telephone conference with P. Lowe regarding appropriate billing judgment; instructions to D. Mallender regarding final fee application corrections.	500.00	2.50	1,250.00
03/01/2023	WDM B160	A103	Draft/revise Second Interim Fee App for Greg Murray as accountant to Trustee.	375.00	3.00	1,125.00
03/02/2023	RAP B190	A101	Office conference with G. Mankotia and M. Villa regarding final changes to 3rd Fee Application; review and approve second Fee Application for G. Murray.	500.00	0.50	250.00

Lowe, Pat (dprt)

Statement No. 236892

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Deeproot - Policy Services, Inc. Case No. 21-51513

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				Rate	Hours	
	WDM B160	A103	Draft/revise Second Interim Fee App for Greg Murray as accountant to Trustee.	375.00	2.80	1,050.00
	WDM B160	A105	Meet with Randall A. Pulman, review Second Interim Fee Application for Greg Murray.	375.00	0.20	75.00
	WDM B160	A108	Correspondence with Pat Lowe regarding Second Interim Fee App for Greg Murray.	375.00	0.20	75.00
03/03/2023	WDM B160	A108	Correspondence with Pat Lowe regarding Supplement to First Interim Fee Application, and Seconding Interim Fee Application for Greg Murray.	375.00	0.20	75.00
03/10/2023	RAP B190	A108	Review of information in deeproot portal; telephone conference with Turner regarding same.	500.00	1.00	500.00
03/14/2023	PR3 B110	A110	Manage data/files - Scanning and saving original financial documents from Silicon Drive Office	110.00	3.50	385.00
04/12/2023	WDM B160	A104	Review/analyze time entries for accuracy and reasonableness in connection with Fourth Interim Fee Application.	375.00	2.90	1,087.50
04/13/2023	WDM B160	A104	Review and edit billing statements/time entries for accuracy and reasonableness in connection with 4th Interim Fee Application.	375.00	1.60	600.00
04/18/2023	WDM B190	A104	Review/analyze claims submitted by Lynn Jurek on behalf of her clients.	375.00	0.60	225.00
04/24/2023	WDM B190	A104	Review/analyze recently filed amended proofs of claim.	375.00	0.50	187.50
05/01/2023	WDM B190	A108	Email correspondence with Chris Turner regarding FedEx subpoena.	375.00	0.20	75.00
05/02/2023	WDM B190	A108	Communicate (other external) with Chris Turner regarding FedEx subpoena.	375.00	0.20	75.00

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				Rate	Hours	
05/18/2023	WDM B190	A108	Communicate (other external) with Evans in FedEx subpoena response department concerning documents requested in subpoena duces tecum.	375.00	0.50	187.50
	WDM B190	A104	Review/analyze spreadsheet and information provided by FedEx in response to subpoena. Email correspondence with C Turner regarding same.	375.00	1.40	525.00
05/23/2023	WDM B190	A104	Review correspondence concerning reinstatement of Latchaw life insurance policy. Review policy.	375.00	0.40	150.00
05/31/2023	WDM B190	A108	Communicate (other external) with Chris Turner regarding renewal of policy services domain service.	375.00	0.20	75.00
	WDM B190	A108	Attention to correspondence concerning transfer of ownership of Latchaw life insurance policy. Email correspondence with Trustee.	375.00	0.20	75.00
			For Legal Services Rendered		93.70	35,180.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	9.60	\$500.00	\$4,800.00
W. Drew Mallender	78.30	375.00	29,362.50
Anna K. MacFarlane	2.30	275.00	632.50
PARA-3	3.50	110.00	385.00

Advances

03/08/2023	B110	E108	Blend Doc Technologies Invoice #57093B	1,202.69
03/31/2023	B110	E106	Online research - PACER	29.70
			Total Advances	1,232.39
			Total Current Work	36,412.39
			Previous Balance	\$26,732.68

Lowe, Pat (dprt)

Statement No. 236892

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Balance Due

\$63,145.07

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
36,412.39	0.00	0.00	0.00	0.00	26,732.68

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	385.00	1232.39
B120	Asset Analysis and Recovery	200.00	0.00
B160	Fee/Employment Applications	30437.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4157.50	0.00
B100	Administration	35,180.00	1,232.39

Invoices are payable upon receipt.

EXHIBIT D-2

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May 31, 2023

Invoice No. 236893
 Account No. 1934.002

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot Funds, L

Fees

					Rate	Hours	
02/09/2023	PR3	B110	A110	Manage data/files - Searching emails and saving them to ND	110.00	1.10	121.00
02/10/2023	WDM	B190	A104	Review/analyze email from FBI to Trustee requesting production of information concerning life insurance policies. Review debtor files for responsive documents.	375.00	0.80	300.00
02/15/2023	AKM	B190	A101	Review of subpoenas.	275.00	0.30	82.50
02/21/2023	LSH	B120	A107	Telephone conference with SEC counsel regarding engagement letter between Mueller/deeproot and Carlile Patchen & Murphy LLP.	450.00	0.10	45.00
	LSH	B120	A105	Communicate (in firm) regarding engagement letter between Mueller/deeproot and Carlile Patchen & Murphy LLP.	450.00	0.10	45.00
02/24/2023	RAP	B190	A109	Telephone conference with SEC counsel regarding attorney client privilege issues; review of correspondence regarding same.	500.00	0.50	250.00
	LSH	B120	A104	Review/analyze documents and emails regarding attorney-client privilege issues.	450.00	0.50	225.00
02/28/2023	PR3	B110	A110	Manage data/files - searching for and saving Engagement Letter from CPM	110.00	1.00	110.00
	LSH	B120	A108	Review engagement letter with Carlile			

Lowe, Pat (dprt)

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot

					Rate	Hours	
				Patchen & Murphy LLP; email to SEC regarding same.	450.00	0.10	45.00
	RAP	B190	A104	Review of engagement agreement with CPM.	500.00	0.20	100.00
03/08/2023	RAP	B190	A108	Telephone conference with counsel for SEC regarding deposition and attorney client privilege information.	500.00	0.50	250.00
	WDM	B190	A104	Review/analyze documents responsive to request for life insurance documents.	375.00	0.30	112.50
	LSH	B120	A104	Review/analyze final judgment against debtor defendants.	450.00	0.30	135.00
03/09/2023	RAP	B190	A108	Attend the deposition of Robert Mueller.	500.00	5.50	2,750.00
	WDM	B190	A109	Attend portion of SEC deposition of Robert Mueller.	375.00	3.00	1,125.00
	LSH	B120	A109	Appear for/attend portion of deposition of Robert Mueller.	450.00	3.00	1,350.00
03/13/2023	RAP	B190	A108	Telephone conference with SEC and Mueller's counsel regarding privilege issues.	500.00	0.50	250.00
	LSH	B120	A108	Video conference with counsel regarding claim of privileged documents.	450.00	0.60	270.00
	LSH	B120	A108	Video conference with R. Pulman and J. Hulings regarding privilege claims potential resolution.	450.00	0.60	270.00
04/12/2023	RAP	B190	A104	Telephone conference with SEC's counsel regarding status of adversary and possible consolidation with SEC action.	500.00	1.00	500.00
	LSH	B120	A108	Telephone conference with SEC Counsel and R. Pulman.	450.00	0.80	360.00
04/14/2023	PR3	B110	A110	Manage data/files - Saving CPM Electronic Files to ND	110.00	1.00	110.00
04/19/2023	PR3	B110	A110	Manage data/files - Uploading and managing CPM files in Eclipse	110.00	2.00	220.00
04/20/2023	PR3	B110	A110	Manage data/files - Uploading and managing CPM files in Eclipse	110.00	2.00	220.00

Lowe, Pat (dprt)

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(deeproot funds) SEC v. Robert J. Mueller, Deeproot

					Rate	Hours	
04/21/2023	PR3	B110	A110	Manage data/files - loading and saving documents into LD	110.00	0.60	66.00
04/27/2023	LSH	B120	A108	Telephone conference with SEC counsel and R. Pulman.	450.00	0.50	225.00
	LSH	B120	A104	Review recent pleadings and orders.	450.00	0.50	225.00
	LSH	B120	A108	Email to counsel for Ascentium regarding scope of order granting motion to permit state court litigation to proceed.	450.00	0.10	45.00
05/04/2023	LSH	B120	A108	Review and respond to email from counsel for Ascentium.	450.00	0.10	45.00
05/09/2023	WDM	B190	A104	Review/analyze amended proofs of claim filed by SEC.	375.00	0.30	112.50
05/23/2023	LSH	B120	A104	Review/analyze documents received from SEC.	450.00	0.40	180.00
05/25/2023	RAP	B160	A104	Telephone conference with Mueller's counsel regarding mediation; e-mail regarding same.	500.00	0.50	250.00
	LSH	B120	A104	Review/analyze documents received from SEC.	450.00	0.50	225.00
	LSH	B120	A103	Draft/revise motion to strike jury demand.	450.00	0.40	180.00
05/26/2023	RAP	B190	A104	Telephone conference with P. Lowe regarding mediation dates.	500.00	0.20	100.00
				For Legal Services Rendered		29.90	10,899.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	8.90	\$500.00	\$4,450.00
W. Drew Mallender	4.40	375.00	1,650.00
Anna K. MacFarlane	0.30	275.00	82.50
PARA-3	7.70	110.00	847.00
Leslie Hyman	8.60	450.00	3,870.00

Total Current Work

10,899.50

Lowe, Pat (dprt)

Statement No. 236893
Account No 1934.002
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(deeproot funds) SEC v. Robert J. Mueller, Deeproot

Balance Due

\$10,899.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	847.00	0.00
B120	Asset Analysis and Recovery	3870.00	0.00
B160	Fee/Employment Applications	250.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	5932.50	0.00
B100	Administration	10,899.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-3

**No fees or
expenses in
this matter No
ees or**

**Expenses in
this matter**

EXHIBIT D-4

**No fees or
expenses in
this matter No
fees or
expesnes in
this matter**

EXHIBIT D-5

**No fees or
expenses in
this matter No
fees or
expenses in
this matter**

EXHIBIT D-6

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May 31, 2023

Invoice No. 236894
 Account No. 1934.006

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(PSI) Claim against Jill R Winn - Net Winner

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of redlines on Settlement Agreement from Winn opposing counsel; review of email from Randall A. Pulman regarding same.	275.00	0.20	55.00
	AKM B180	A101	Phone call with opposing counsel regarding changes to settlement agreement draft (Winn).	275.00	0.20	55.00
	AKM B180	A101	Continue drafting Settlement Agreement per opposing counsel comments and edits.	275.00	0.60	165.00
02/03/2023	AKM B180	A101	Confer with Randall A. Pulman Regarding settlement agreement revisions.	275.00	0.20	55.00
	AKM B180	A101	Emails with opposing counsel with revised draft of settlement agreement (Winn).	275.00	0.20	55.00
02/13/2023	AKM B180	A101	Phone call with Royal Lea regarding settlement.	275.00	0.10	27.50
	AKM B180	A101	Emails with Royal Lea regarding settlement and sending new execution copy of agreement.	275.00	0.40	110.00
	AKM B180	A101	Updating Winn settlement agreement per Royal Lea phone call.	275.00	0.10	27.50
02/14/2023	AKM B180	A101	Attention to Winn settlement emails.	275.00	0.50	137.50
02/15/2023	AKM B180	A101	Emails with Royal regarding check (Winn).	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 236894
Account No 1934.006
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(PSI) Claim against Jill R Winn - Net Winner

					Rate	Hours	
03/02/2023	GM	B190	A101	Prepare draft of 9019 with Jill Winn along with a proposed order; email Randall A. Pulman and Anna the same.	100.00	4.00	400.00
	AKM	B190	A101	Review of emails from Gaurav Mankotia regarding combining Winn and Snell 9019 motions.	275.00	0.40	110.00
03/03/2023	GM	B190	A101	Continue prepare draft of 9019 with Jill Winn along with a proposed order; confer with Randall A. Pulman to combine motion with Alice Snell and Carl; Edit the draft after Randall A. Pulman's suggestion. email Randall A. Pulman and Anna the same.	100.00	2.50	250.00
03/04/2023	AKM	B190	A101	Review of Winn/Snell 9019 Motion.	275.00	0.50	137.50
03/09/2023	GM	B190	A101	Amend 9019 after Randall A. Pulman edits; confer with Anna McFarlane regarding same; email Randall A. Pulman and Anna Mcfarlane regarding same.	100.00	0.50	50.00
	AKM	B190	A101	Continue drafting Winn/Snell 9019 Motion and confer with Gaurav Mankotia regarding same.	275.00	1.00	275.00
	RAP	B190	A108	Review and edit of 9019 Motion; office conference with G. Mankotia regarding same.	500.00	0.50	250.00
03/10/2023	GM	B190	A101	Continue amend 9019 after Randall A. Pulman's suggestions; confer with Randall A. Pulman regarding same.	100.00	0.80	80.00
03/12/2023	RAP	B190	A108	Review and edit of 9019 Motion for Settlement.	500.00	0.20	100.00
03/13/2023	AKM	B190	A101	Emails with Royal Lea regarding draft 9019 Motion and approval of same.	275.00	0.20	55.00
04/11/2023	AKM	B190	A101	Attention to 9019 order approving settlement with Winn and Snell.	275.00	0.20	55.00
				For Legal Services Rendered		13.50	2,505.00

Lowe, Pat (dprt)

Statement No. 236894

Account No 1934.006

(PSI) Claim against Jill R Winn - Net Winner

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Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.70	\$500.00	\$350.00
Anna K. MacFarlane	5.00	275.00	1,375.00
Gaurav Mankotia	7.80	100.00	780.00

Advances

03/07/2023	B110	E106	Online research - TransUnion	15.00
			Total Advances	15.00

Total Current Work	2,520.00
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Balance Due	<u>\$2,520.00</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	15.00
B180 Avoidance Action Analysis	742.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	1762.50	0.00
B100 Administration	2,505.00	15.00

Invoices are payable upon receipt.

EXHIBIT D-7D-7

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May 31, 2023

Invoice No. 236895
 Account No. 1934.007

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(PSI) Claims Against Robert J. Mueller, et al.

Fees

				Rate	Hours	
02/08/2023	AKM B180	A101	Review Defendant's initial disclosures.	275.00	0.30	82.50
	AKM B180	A101	Preparing draft of initial disclosures to Mueller and confer with Randall A. Pulman regarding same.	275.00	1.60	440.00
	RAP B160	A105	In office conference with Anna MacFarlane regarding initial disclosures.	500.00	0.20	100.00
02/09/2023	AKM B180	A101	Continue drafting Mueller disclosures.	275.00	0.50	137.50
02/10/2023	AKM B180	A101	Continue drafting Mueller disclosures; serving same on opposing counsel.	275.00	1.00	275.00
	RAP B180	A108	Review and approve disclosures;	500.00	0.20	100.00
02/13/2023	RAP B190	A104	Telephone conference with J. Hulling regarding scheduling and abatement.	500.00	0.50	250.00
02/15/2023	WDM B190	A104	Review/analyze FBI subpoenas issued in Mueller criminal case.	375.00	0.20	75.00
03/10/2023	RAP B190	A108	Review of demand letter to Mueller; office conference with D. Mallender regarding same; final review and signature of same.	500.00	0.50	250.00
	RAP B190	A108	Review of Request for Admissions to Mueller; office conference with D. Mallender regarding same; final review and signature of same.	500.00	0.50	250.00
	WDM B180	A105	Meet with Randall A. Pulman regarding demand letter to Mueller.	375.00	0.20	75.00

Lowe, Pat (dprt)

Statement No. 236895

Account No 1934.007

(PSI) Claims Against Robert J. Mueller, et al.

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					Rate	Hours	
		WDM B180	A104	Review/analyze data contained in deeproot funds online portal.	375.00	1.70	637.50
		WDM B180	A103	Draft/revise demand letter to Mueller and requests for admission.	375.00	4.40	1,650.00
03/13/2023	RAP	B190	A108	Telephone conference with Mueller's counsel regarding outlines of a settlement.	500.00	0.50	250.00
03/15/2023	RAP	B190	A108	Office conference with L. Hyman regarding claims against Mueller.	500.00	0.50	250.00
	LSH	B120	A105	Conference with R. Pulman regarding strategy and next steps.	450.00	0.60	270.00
03/17/2023	RAP	B190	A107	Review of settlement offer from Mueller.	500.00	0.20	100.00
03/23/2023	RAP	B190	A105	Telephone conference with state bar prosecutor regarding Mueller complaints.	500.00	0.50	250.00
03/27/2023	RAP	B190	A104	Review of document prepared by Mueller regarding assets backing up deeproot investments; instructions to B. Wulfe regarding additional research in documents.	500.00	0.20	100.00
03/28/2023	PR3	B110	A110	Manage data/files - Searching for and creating excels sheets regarding how much policies were sold to early investors	110.00	2.50	275.00
03/29/2023	PR3	B110	A110	Manage data/files - editing excel sheet regarding policies sold to early investors.	110.00	2.50	275.00
	RAP	B190	A104	Review of information gathered by clerk on policies previously sold by Mueller; office conference with L. Hyman regarding same and fraud claim against Mueller.	500.00	0.50	250.00
	LSH	B120	A102	Legal research regarding standing to bring claims against R. Mueller.	450.00	0.90	405.00
03/30/2023	LSH	B120	A102	Legal research regarding standing to bring claims against R. Mueller.	450.00	2.90	1,305.00
03/31/2023	LSH	B120	A105	Conference with R. Pulman regarding			

Lowe, Pat (dprt)

Statement No. 236895
Account No 1934.007
Page: 3

(PSI) Claims Against Robert J. Mueller, et al.

					Rate	Hours	
				theories of liability.	450.00	0.30	135.00
	LSH	B120	A102	Legal research regarding regarding theories of liability.	450.00	0.40	180.00
04/04/2023	LSH	B120	A103	Review and revise draft counter-offer.	450.00	0.10	45.00
04/05/2023	RAP	B190	A104	Review and edit of settlement offer; send to opposing counsel; telephone conference with J. Huling regarding same.	500.00	0.50	250.00
04/10/2023	RAP	B190	A104	Review of response to Request for Admissions.	500.00	0.20	100.00
04/12/2023	LSH	B120	A102	Research regarding jury demand and potential jury waiver.	450.00	0.20	90.00
04/19/2023	RAP	B190	A105	Office conference with L. Hyman regarding waiver of jury right by filing proof of claim.	500.00	0.10	50.00
	RAP	B190	A105	Office conference with L. Hyman regarding Motion for Summary Judgment on constructive fraud claims.	500.00	0.50	250.00
	LSH	B120	A102	Legal research regarding right to a jury for a trustee's breach of fiduciary duty claim.	450.00	2.60	1,170.00
	LSH	B120	A105	Conference with R. Pulman regarding whether or not to abate case, withdraw the reference, or move for summary judgment.	450.00	0.20	90.00
04/26/2023	RAP	B190	A108	Telephone conference with SEC regarding mediation and consolidation.	500.00	0.50	250.00
	RAP	B190	A108	Telephone conference with Lowe regarding strategy.	500.00	0.30	150.00
	RAP	B190	A108	Telephone conference with J. Huling regarding stay and mediation.	500.00	0.30	150.00
04/27/2023	AKM	B190	A101	Phone call with Randall A. Pulman and Pat Lowe regarding Mueller motion to abate.	275.00	0.30	82.50
	AKM	B190	A101	Review of case law regarding proof of claim and jury demand; phone call with Pat Lowe regarding same.	275.00	0.40	110.00

Lowe, Pat (dprt)

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(PSI) Claims Against Robert J. Mueller, et al.

				Rate	Hours	
	RAP	B190	A108	Telephone conference with SEC regarding mediation and consolidation.	500.00	0.50 250.00
	RAP	B190	A108	Telephone conference with Lowe regarding strategy.	500.00	0.30 150.00
	RAP	B190	A108	Telephone conference with J. Hulling regarding stay and mediation.	500.00	0.30 150.00
	WDM	B190	A104	Review Motion to Abate/Transfer.	375.00	0.40 150.00
	LSH	B120	A108	Telephone conference with J. Hulings and R. Pulman regarding abatement.	450.00	0.20 90.00
05/09/2023	RAP	B190	A104	Review and edit of Agreed Order on Abatement; forward to opposing counsel; telephone conference with Lowe regarding same.	500.00	0.50 250.00
05/15/2023	RAP	B190	A104	Hearing on Motion to Abate. For Legal Services Rendered	500.00	1.00 500.00
						33.70 12,695.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	9.30	\$500.00	\$4,650.00
W. Drew Mallender	6.90	375.00	2,587.50
Anna K. MacFarlane	4.10	275.00	1,127.50
PARA-3	5.00	110.00	550.00
Leslie Hyman	8.40	450.00	3,780.00

Advances

03/27/2023	B110	E115	Deposition transcripts - Gradillas Court Reporters #55954	1,378.60
			Total Advances	1,378.60
			Total Current Work	14,073.60

Balance Due \$14,073.60

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	550.00	1378.60
B120	Asset Analysis and Recovery	3780.00	0.00

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(PSI) Claims Against Robert J. Mueller, et al.

		<u>Fees</u>	<u>Expenses</u>
B160	Fee/Employment Applications	100.00	0.00
B180	Avoidance Action Analysis	3397.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4867.50	0.00
B100	Administration	12,695.00	1,378.60

Invoices are payable upon receipt.

EXHIBIT D-8

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May 31, 2023

Invoice No. 236896
 Account No. 1934.008

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(PSI) Potential Adversary Proceedings - Net Winners

Fees

					Rate	Hours	
02/02/2023	RAP	B180	A104	Telephone conference with R. Lea regarding edits to settlement agreement; office conference with A. MacFarlane regarding same.	500.00	0.50	250.00
02/03/2023	RAP	B180	A104	Review of edits settlement agreement; office conference with A. MacFarlane regarding same.	500.00	0.20	100.00
02/13/2023	AKM	B180	A101	Begin preparing disclosures to net winners.	275.00	0.20	55.00
02/19/2023	AKM	B190	A101	Continue drafting request for clerks' entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
03/01/2023	RAP	B190	A101	Review and edit of Motion for Default Judgment; office conference with G. Mankotia regarding same.	500.00	1.00	500.00
03/05/2023	GM	B190	A101	Prepare draft of Default Judgment along with a proposed order, affidavit and exhibits; review tracking on USPS website.	100.00	3.00	300.00
03/06/2023	GM	B190	A101	Continue prepare draft of Default Judgment along with a proposed order, affidavit and exhibits; review details pursuant to Service members Civil Relief			

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Net Winner

					Rate	Hours	
				Act; Confer with Mary Ann and Marshall regarding same; confer with Randall A. Pulman regarding edits; Edited the same.	100.00	8.00	800.00
03/07/2023	GM	B190	A101	Amend draft of default judgment; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
	RAP	B190	A108	Review of Motion for Default Judgment.	500.00	0.20	100.00
	RAP	B190	A108	Review and edit of Motion for Default Judgment.	500.00	0.50	250.00
	AKM	B190	A101	Confer with Gaurav Mankotia regarding motion for default judgment.	275.00	0.50	137.50
03/08/2023	RAP	B190	A108	Review and edit of Motion for Default Judgment against Net Winners; office conference with G. Mankotia regarding same.	500.00	1.00	500.00
	GM	B190	A101	Attend office conference with Randall A. Pulman, Anna, Mary Ann and Jamie to discuss and plan adversaries.	100.00	0.50	50.00
	AKM	B160	A105	Office conference with Randall A. Pulman and G. Mankotia.	275.00	0.50	137.50
04/11/2023	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
				For Legal Services Rendered		17.00	3,385.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	3.60	\$500.00	\$1,800.00
Anna K. MacFarlane	1.40	275.00	385.00
Gaurav Mankotia	12.00	100.00	1,200.00

Total Current Work 3,385.00

Balance Due \$3,385.00

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Net Winner

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B160	Fee/Employment Applications	137.50	0.00
B180	Avoidance Action Analysis	405.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2842.50	0.00
B100	Administration	3,385.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-9

**No fees or
expenses in
this matter**

EXHIBIT D-10

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May 31, 2023

Invoice No. 236897
 Account No. 1934.010

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(deeproot Tech) Sale of Pinball Property

Fees

				Rate	Hours	
02/06/2023	WDM B190	A108	Email correspondence and telephone conversations with Pat Autry regarding pinball property in possession of Adam Sidwell.	375.00	0.30	112.50
	WDM B190	A104	Review/analyze proposal from Eric Vogeler regarding turnover of pinball IP.	375.00	0.30	112.50
02/08/2023	WDM B190	A108	Communicate (other external) with Chris Turner regarding proposed agreement with Adam Sidwell for turnover of pinball IP.	375.00	0.20	75.00
02/21/2023	WDM B190	A108	Telephone call with Chris Turner regarding letter agreement received from Eric Vogel.	375.00	0.20	75.00
03/07/2023	WDM B190	A108	Email correspondence with Chris Turner regarding Sidwell issues, pinball IP. Conference call with Randall A. Pulman and Chris Turner regarding same.	375.00	0.30	112.50
			For Legal Services Rendered		1.30	487.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
W. Drew Mallender	1.30	\$375.00	\$487.50

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(deeproot Tech) Sale of Pinball Property

Total Current Work 487.50

Balance Due \$487.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	487.50	0.00
B100	Administration	487.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-33

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May 31, 2023

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(PSI) Potential Adversary Proceedings - Finders

Fees

					Rate	Hours	
02/01/2023	RAP	B180	A104	Review of confirmation of filings of 21 adversary proceedings; review and approval of costs; office conference with staff regarding service of summons in al cases.	500.00	1.00	500.00
02/02/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding reviewing summons served.	275.00	0.10	27.50
	AKM	B180	A101	Email to Benjamin Wulfe regarding review of emails to Finder defendants.	275.00	0.20	55.00
	RAP	B180	A104	Review and signature of 21 returned summons; office conference with staff regarding verification of Certified mail return receipt records.	500.00	0.50	250.00
02/08/2023	AKM	B180	A101	Attention to scheduling matters.	275.00	0.20	55.00
	AKM	B180	A101	Scheduling call with Hauswirth (represents multiple finders).	275.00	0.20	55.00
02/10/2023	AKM	B180	A101	Phone call with Randall A. Pulman and Greg Hauswirth.	275.00	0.30	82.50
	RAP	B160	A105	Phone call with Anna MacFarlane and Hauswirth.	500.00	0.30	150.00
02/14/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding documents and supplemental disclosures.	275.00	0.20	55.00
	RAP	B180	A105	Confer with Anna K. MacFarlane regarding documents and supplemental disclosures.	500.00	0.20	100.00

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					Rate	Hours	
02/24/2023	AKM B190	A101	Attention to scheduling orders.		275.00	0.20	55.00
02/27/2023	AKM B190	A101	Confer with Randall A. Pulman regarding tasks for Gaurav Mankotia.		275.00	0.30	82.50
	RAP B190	A104	Instructions to G. Mankotia regarding handling and processing of Motions for Default Judgment, responses to request for disclosure and document requests to opposing parties in all finder cases; e-mail regarding same.		500.00	1.00	500.00
02/28/2023	AKM B190	A101	Confer with Randall A. Pulman regarding other banks.		275.00	0.10	27.50
	RAP B190	A101	Confer with AKM regarding other banks.		500.00	0.10	50.00
03/08/2023	AKM B190	A101	Internal case management meeting regarding pending adversary proceedings.		275.00	0.50	137.50
	RAP B190	A108	Office conference with staff, A. MacFarlane, G. Mankotia regarding tasks in finder adversary proceedings; assignment of same.		500.00	0.80	400.00
03/13/2023	AKM B190	A101	Confer with Gaurav Mankotia regarding supplemental disclosures.		275.00	0.20	55.00
03/14/2023	AKM B190	A101	Confer with G. Mankotia regarding disclosures and defaults.		275.00	0.30	82.50
03/15/2023	AKM B190	A101	Office conference with Randall A. Pulman and G. Mankotia regarding Gargotta opinion on mail service.		275.00	0.60	165.00
03/17/2023	AKM B190	A101	In-office conference with Randall A. Pulman regarding status of adversaries.		275.00	0.50	137.50
	AKM B190	A101	Confer with Dana V. regarding case status spreadsheet.		275.00	0.20	55.00
03/21/2023	AKM B190	A101	Multiple office conferences with G. Mankotia regarding disclosures and discovery in adversary proceedings.		275.00	0.50	137.50

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(PSI) Potential Adversary Proceedings - Finders

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					Rate	Hours	
03/23/2023	AKM	B190	A101	Confer with G. Mankotia regarding Rule 26(a) disclosure document production.	275.00	0.30	82.50
	AKM	B190	A101	Office conference with Randall A. Pulman regarding next steps.	275.00	0.20	55.00
03/28/2023	AKM	B190	A101	Office conference with G. Mankotia regarding disclosures, RFPs, and default letters.	275.00	0.20	55.00
03/30/2023	AKM	B190	A101	Confer with Randall A. Pulman regarding adversary proceedings.	275.00	0.20	55.00
	RAP	B190	A101	Confer with Anna MacFarlane regarding adversaries.	500.00	0.20	100.00
04/04/2023	AKM	B190	A101	Meeting with Randall A. Pulman, G. Mankotia, and J. Gonzales regarding status of adversary proceedings.	275.00	0.60	165.00
	RAP	B190	A104	Office conference with staff regarding status of adversary proceedings.	500.00	1.00	500.00
	GM	B190	A101	Meeting with Randall A. Pulman, Anna and J. Gonzales regarding status of adversary proceedings.	100.00	1.00	100.00
04/05/2023	AKM	B190	A101	Office conference with Randall A. Pulman regarding status of adversary proceedings and next steps.	275.00	0.30	82.50
	AKM	B190	A101	Updating tracking chart per office conference with Randall A. Pulman.	275.00	5.00	1,375.00
04/07/2023	AKM	B190	A101	Creating updated tracking chart.	275.00	2.00	550.00
	AKM	B190	A101	Begin creating case checklist.	275.00	0.50	137.50
04/10/2023	AKM	B190	A101	Case status meeting.	275.00	0.50	137.50
	GM	B190	A101	office conference with Randall A. Pulman, Anna, Mary Ann and Jamie for matters update and strategy.	100.00	0.50	50.00
	RAP	B190	A101	Case status meeting with staff.	500.00	0.50	250.00
04/11/2023	AKM	B190	A101	Attention to document production issues.	275.00	0.30	82.50
04/17/2023	AKM	B190	A101	Updating adversary proceeding tracking chart.	275.00	0.50	137.50

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(PSI) Potential Adversary Proceedings - Finders

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					Rate	Hours	
04/18/2023	AKM	B190	A101	Conduct legal research regarding pre-judgment interest for 544 claims for default judgment motions.	275.00	1.00	275.00
	GM	B190	A101	Research for cases on Pre-Judgment Interest.	100.00	2.00	200.00
04/19/2023	AKM	B190	A101	Update adversary tracking chart and review of cases per scheduling order deadlines.	275.00	3.00	825.00
04/25/2023	AKM	B190	A101	Confer with Randall A. Pulman regarding case status.	275.00	0.10	27.50
	AKM	B190	A101	Updating status chart.	275.00	0.50	137.50
04/27/2023	AKM	B190	A101	Updating status chart.	275.00	0.30	82.50
04/28/2023	AKM	B190	A101	Email from Pat Lowe regarding jury demand question (0.1); review of filed answers to determine which defendants demanded jury trial (0.6); email to Pat Lowe regarding same.	275.00	0.80	220.00
05/01/2023	AKM	B190	A101	Updating case chart.	275.00	0.20	55.00
05/04/2023	GM	B190	A101	Review of 202 Proofs of Claim filed in the Policy Services case that are based on Life Settlement Certificates.	100.00	4.00	400.00
05/05/2023	GM	B190	A101	Continue review of 202 Proofs of Claim filed in Claim filed in the Policy Services case that are based on Life Settlement Certificates; saved them in netdocs.	100.00	3.00	300.00
05/08/2023	AKM	B190	A101	Review of Policy Services proofs of claim reliant on life settlement certificates.	275.00	0.50	137.50
05/09/2023	AKM	B190	A101	Office conference with Randall A. Pulman, G. Mankotia, and MaryAnn Villa regarding adversary proceeding status and next steps.	275.00	0.80	220.00
	AKM	B190	A101	Review of finder agreements for jury			

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Finders

					Rate	Hours	
				waiver language; email Randall A. Pulman regarding same.	275.00	0.50	137.50
	AKM	B190	A101	Updating adversary tracking chart per Randall A. Pulman comments at meeting.	275.00	0.50	137.50
	GM	B190	A101	office conference with Randall A. Pulman, Anna and MaryAnn regarding adversary proceedings and strategy.	100.00	1.00	100.00
	GM	B190	A101	Research for cases on prejudgment interest; date of accrual of prejudgment interest; whether prejudgment interest accrues for 548 claims as well; confer with Anna regarding same.	100.00	3.00	300.00
05/15/2023	AKM	B190	A101	Office conference with Randall A. Pulman and Leslie S. Hyman regarding motions for summary judgment.	275.00	0.50	137.50
	AKM	B190	A101	Emails with Greg Hauswirth regarding receipt of RFP responses.	275.00	0.20	55.00
	AKM	B190	A101	Email to Leslie S. Hyman regarding Motions for Summary Judgment.	275.00	0.50	137.50
	AKM	B190	A101	Office conference with G. Mankotia regarding next steps in adversary proceedings.	275.00	0.30	82.50
	GM	B190	A101	office conference with Anna regarding next steps in adversary proceedings.	100.00	0.30	30.00
	LSH	B190	A101	Office conference with Randall A. Pulman and Anna MacFarlane regarding motions for summary judgement.	450.00	0.50	225.00
	RAP	B190	A101	Office conference with Anna MacFarlane and Leslie S. Hyman regarding motions for summary judgement.	500.00	0.50	250.00
05/16/2023	GM	B190	A101	Updating adversary tracking chart per Randall A. Pulman comments; confer with Anna regarding same.	100.00	0.50	50.00
05/18/2023	AKM	B190	A101	Emails with Greg Hauswirth confirming receipt of document production for several defendants.	275.00	0.20	55.00
05/24/2023	RAP	B190	A104	Review and edit of Motions to Strike Jury Demand; office conference with G.			

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Finders

					Rate	Hours	
				Mankotia regarding edits to Motion.	500.00	1.00	500.00
05/30/2023	AKM	B190	A101	Office conference with Randall A. Pulman, Leslie S. Hyman, and G. Mankotia regarding adversary proceedings.	275.00	0.50	137.50
	GM	B190	A101	office conference with Randall A. Pulman, Leslie S. Hyman and Anna regarding adversary proceedings.	100.00	0.50	50.00
	RAP	B190	A104	Office conference with L. Hyman and A. MacFarlane regarding lawfulness of RIA contracts to recommend the purchase of securities.	500.00	0.50	250.00
05/31/2023	RAP	B190	A104	Review of Motion to Strike Jury Demand; office conference with L. Hyman and G. Mankotia regarding same.	500.00	0.50	250.00
	AKM	B190	A101	Begin drafting omnibus 9019 motion (AmEx, Gillen, Parchami, Senior Insurance, Obmann, Martins); review of client files regarding same.	275.00	1.50	412.50
				For Legal Services Rendered		51.50	13,307.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	8.10	\$500.00	\$4,050.00
Anna K. MacFarlane	27.10	275.00	7,452.50
Gaurav Mankotia	15.80	100.00	1,580.00
Leslie Hyman	0.50	450.00	225.00

Total Current Work 13,307.50

Balance Due \$13,307.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B160	Fee/Employment Applications	150.00	0.00
B180	Avoidance Action Analysis	1180.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	11977.50	0.00

Lowe, Pat (dprt)

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(PSI) Potential Adversary Proceedings - Finders

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		<u>Fees</u>	<u>Expenses</u>
B100	Administration	13,307.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-34

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May 31, 2023

Invoice No. 236899
 Account No. 1934.012

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Claims against Financial Horizon Concepts LLC - Finder

Fees

					Rate	Hours	
03/13/2023	GM	B190	A101	Prepare draft of initial disclosures per 26(a); confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	2.50	250.00
03/14/2023	AKM	B190	A101	Review of initial disclosures.	275.00	0.20	55.00
	GM	B190	A101	Prepare initial disclosures; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same; continue amend and edit after Anna MacFarlane's comments.	100.00	6.00	600.00
03/15/2023	PR3	B110	A110	Manage data/files - Searching for and saving emails in ND	110.00	1.00	110.00
03/16/2023	PR3	B110	A110	Manage data/files - searching for and saving emails into ND	110.00	3.10	341.00
03/21/2023	AKM	B190	A101	Review of Rule 26(a) disclosures.	275.00	0.60	165.00
	GM	B190	A101	Continue prepare initial disclosures after Anna's comments; confer with Anna regarding same; email Anna the same.	100.00	1.00	100.00
	GM	B190	A101	Multiple office conference's with B. Wulfe regarding setting up collabspace.	100.00	2.00	200.00
04/12/2023	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Read through 468 emails for witness list.	100.00	7.00	700.00
	RAP	B190	A101	Review and signature of Rule 26(c)			

Lowe, Pat (dprt)

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Claims against Financial Horizon Concepts LLC - F

				Disclosures.	Rate 500.00	Hours 0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Emails with Greg Hauswirth regarding deadlines for discovery and disclosures.	275.00	0.20	55.00
	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/17/2023	GM	B190	A101	Research and prepare motion for withdrawal of jury demand; confer with Randall A. Pulman regarding same.	100.00	4.00	400.00
	RAP	B190	A101	Review of Gaurav Mankotia research and confer with Gaurav Mankotia regarding same.	500.00	0.50	250.00
05/19/2023	GM	B190	A101	Prepare a letter regarding withdrawal of jury demand along with an agreed order; confer with Randall A. Pulman regarding same.	100.00	3.00	300.00
	RAP	B190	A101	Review and edit of Gaurav Mankotia letter.	500.00	0.50	250.00
05/22/2023	GM	B190	A101	Continue prepare and amend letter			

Lowe, Pat (dprt)

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Claims against Financial Horizon Concepts LLC - F

					Rate	Hours	
				regarding withdrawal of jury demand along with an agreed order after Randall A. Pulman's comments; email MaryAnn the the final draft.	100.00	1.00	100.00
05/24/2023	RAP	B190	A104	Final review, edit and signature of letter regarding jury waiver and proposed agreed order.	500.00	1.00	500.00
				For Legal Services Rendered		37.10	5,121.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.20	\$500.00	\$1,100.00
Anna K. MacFarlane	2.80	275.00	770.00
PARA-3	4.10	110.00	451.00
Gaurav Mankotia	28.00	100.00	2,800.00

Total Current Work 5,121.00

Balance Due \$5,121.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	451.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4670.00	0.00
B100	Administration	5,121.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-35

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May 31, 2023

Invoice No. 236900
 Account No. 1934.013

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Claims against Kenneth & Brownie Martin - Net Winners

Fees

				Rate	Hours	
02/03/2023	AKM B180	A101	Telephone Call with Kenneth Martin regarding correspondence and claims.	275.00	0.40	110.00
02/16/2023	AKM B180	A101	Continue drafting request for clerk's entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/23/2023	AKM B190	A101	Finalizing Request for Clerk's Entry of Default for filing.	275.00	0.30	82.50
02/27/2023	AKM B190	A101	Review of Entry of Default.	275.00	0.10	27.50
03/16/2023	AKM B190	A101	Review of Motion for Default Judgment and emails with G. Mankotia regarding same.	275.00	0.50	137.50
	GM B190	A101	Prepare motion for entry of default judgment along with a proposed order and Randall A. Pulman's affidavit; searched for military employment and USPS delivery receipt; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	5.00	500.00
03/17/2023	RAP B190	A107	Final review and approval of Motion for Default Judgment.	500.00	0.20	100.00
	GM B190	A101	Continue to prepare and finalize motion for default judgment; email Anna MacFarlane and Mary Ann Villa the same for filing.	100.00	0.50	50.00

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Claims against Kenneth & Brownie Martin - Net Wi

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					Rate	Hours	
	GM	B190	A101	Continue to prepare and finalize motion for default judgment; email Anna MacFarlane and Mary Ann Villa the same.	100.00	1.00	100.00
04/04/2023	AKM	B190	A101	Review of Motion to Reset 4/10 Hearing and proposed order.	275.00	0.30	82.50
04/05/2023	AKM	B190	A101	Final review of Motion to Reset 4/10 Hearing and proposed order; filing of same.	275.00	0.30	82.50
	GM	B190	A101	Prepare Motion to Reset 4/10 Hearing and proposed order; confer with Anna regarding same; email Anna the same; Edit after Anna's suggestions; email Jamie the same for filing.	100.00	3.00	300.00
04/10/2023	AKM	B190	A101	Appear for and attend default hearing.	275.00	0.30	82.50
	RAP	B190	A104	Prepare for hearing on Motion for Default Judgment; attend hearing on Motion for Default Judgment.	500.00	0.80	400.00
	GM	B190	A101	Attend default hearing.	100.00	0.30	30.00
04/25/2023	AKM	B190	A101	Prepare and mail notice of default judgment letter to defendant.	275.00	0.30	82.50
05/04/2023	AKM	B190	A101	Phone calls and emails with K. Vaughn regarding payment of judgment.	275.00	0.50	137.50
	AKM	B190	A101	Email and phone calls with Randall A. Pulman regarding payment of Martin judgment and interest.	275.00	0.30	82.50
	AKM	B190	A101	Emails coordinating payment of judgment.	275.00	0.20	55.00
	RAP	B190	A101	Telephone conference with A. MacFarlane regarding payment of default judgment.	500.00	0.30	150.00
05/08/2023	AKM	B190	A101	Attention to judgment release check and letter; email K. Vaughn regarding receipt of same.	275.00	0.20	55.00
05/09/2023	AKM	B190	A101	Emails to/from Ken Vaughn regarding			

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Claims against Kenneth & Brownie Martin - Net Wi

				check.	Rate 275.00	Hours 0.30	82.50
05/14/2023	GM	B190	A101	Prepare Post Judgment Discovery RFP and ROGS for Kenneth Martin and Brownie Martin.	100.00	3.00	300.00
				For Legal Services Rendered		18.30	3,085.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.30	\$500.00	\$650.00
Anna K. MacFarlane	4.20	275.00	1,155.00
Gaurav Mankotia	12.80	100.00	1,280.00

Total Current Work 3,085.00

Balance Due \$3,085.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	165.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2920.00	0.00
B100	Administration	3,085.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-36

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May 31, 2023

Invoice No. 236901
 Account No. 1934.014

Page: 1

Claims against David & Mary Medlang - Net Winners

Fees

				Rate	Hours	
02/24/2023	AKM	B190	A101	Review of order granting Medlang 9019 Motion.	275.00	0.10
						27.50
				For Legal Services Rendered		0.10
						27.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	0.10	\$275.00	\$27.50

Total Current Work	27.50
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Balance Due	<u>\$27.50</u>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	27.50	0.00
B100	Administration	27.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-37

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May 31, 2023

Invoice No. 236902
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Claims against Financial Partners of America LLC - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
02/24/2023	AKM B190	A101	Emails with opposing counsel regarding answer date extension to March 17.	275.00	0.20	55.00
02/28/2023	AKM B190	A101	Prepare advisory to court regarding answer extension through March 16, 2023.	275.00	0.50	137.50
	AKM B190	A101	Multiple emails with opposing counsel regarding advisory to court regarding answer extension through March 16, 2023.	275.00	0.30	82.50
03/03/2023	PR3 B110	A110	Manage data/files - searching and saving emails	110.00	0.40	44.00
03/07/2023	AKM B190	A101	Call with opposing counsel regarding potential resolution.	275.00	0.10	27.50
	AKM B190	A101	Review of financial documentation.	275.00	0.30	82.50
	AKM B190	A101	Confer with Randall A. Pulman regarding call with opposing counsel.	275.00	0.10	27.50
	RAP B190	A108	Review of financial information and tax returns; office conference with A. MacFarlane.	500.00	0.30	150.00
03/08/2023	AKM B190	A101	Call with opposing counsel regarding potential settlement.	275.00	0.10	27.50
04/09/2023	GM B190	A101	Prepare Rule 26 Disclosures and Request			

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Claims against Financial Partners of America LLC -

					Rate	Hours	
				for Production of Documents; segregated email correspondence on netdocs; Read through email correspondence for witness list.	100.00	4.00	400.00
04/10/2023	AKM	B190	A101	Review of RFP and initial disclosures; confer with G. Mankotia regarding same.	275.00	0.60	165.00
	GM	B190	A101	Continue prepare Rule 26 Disclosures and Request for Production of Documents and read through email correspondence for witness list; confer with Ann regarding same; email Anna the same.	100.00	2.50	250.00
04/11/2023	AKM	B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
	RAP	B190	A101	Review and approve Rule 26 disclosure.	500.00	0.30	150.00
05/08/2023	AKM	B190	A101	Emails to/from Caroline Saunders regarding one-week extension for discovery responses.	275.00	0.30	82.50
				For Legal Services Rendered		10.90	1,886.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.80	\$500.00	\$400.00
Anna K. MacFarlane	2.70	275.00	742.50
PARA-3	0.40	110.00	44.00
Gaurav Mankotia	7.00	100.00	700.00

Total Current Work 1,886.50

Balance Due \$1,886.50

Lowe, Pat (dprt)

Statement No. 236902

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Claims against Financial Partners of America LLC -

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	44.00	0.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1815.00	0.00
B100	Administration	1,886.50	0.00

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EXHIBIT D-38

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May 31, 2023

Invoice No. 236903
 Account No. 1934.016

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Claims against INF Solutions LLC - Finder

Fees

					Rate	Hours	
03/08/2023	AKM	B190	A101	Review of draft requests for production.	275.00	0.40	110.00
	GM	B190	A101	Prepare Request for Production for INF Solutions, Scott Milbourne and Raphael Vallier; confer with Randall A. Pulman regarding same.	100.00	3.00	300.00
	RAP	B190	A101	Review and edit of draft of requests; office conference with Gaurav Mankotia regarding same.	500.00	0.50	250.00
03/09/2023	GM	B190	A101	Continue prepare RFP's for INF Solutions, Scott Milbourne and Raphael Vallier; confer with Randall A. Pulman regarding same. Revise Amended RFP's after Randall A. Pulman edits.	100.00	4.00	400.00
	AKM	B190	A101	Email to Gregory Hauswirth regarding available docket call dates.	275.00	0.10	27.50
03/10/2023	GM	B190	A101	Continue preparing RFP's for INF Solutions, Scott and Raphael; confer with Randall A. Pulman regarding same.	100.00	2.00	200.00
03/12/2023	GM	B190	A101	Continue preparing RFP's for INF Solutions, Scott and Raphael; after Randall A. Pulman's edits; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
	RAP	B190	A108	Review and approval of three sets of document requests.	500.00	0.30	150.00
03/13/2023	GM	B190	A101	Continue edit final draft of RFP's after			

Lowe, Pat (dprt)

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Claims against INF Solutions LLC - Finder

					Rate	Hours	
				Anna MacFarlane edits; confer with Anna MacFarlane and Jamie regarding same.	100.00	0.50	50.00
	AKM	B190	A101	Review of draft RFPs.	275.00	0.30	82.50
03/15/2023	PR3	B110	A110	Manage data/files - Searching for and saving emails in ND	110.00	3.00	330.00
03/29/2023	GM	B190	A101	Drafted supplementary 26(a) disclosure; analysed 333 emails and segregated relevant emails; confer with Anna regarding same; e-mail Anna the same.	100.00	7.00	700.00
04/04/2023	GM	B190	A101	Continue prepare and amend 26(a) Supplementary Disclosures; further read through emails for Witness list; confer with Anna regarding same; email Anna the same.	100.00	5.00	500.00
04/07/2023	AKM	B190	A101	Review of supplemental disclosures.	275.00	0.50	137.50
04/11/2023	AKM	B190	A101	Final review of supplemental disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures.	100.00	0.50	50.00
04/17/2023	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.50	137.50
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
04/25/2023	AKM	B190	A101	Phone call with opposing counsel regarding extension of discovery response deadline to May 3.	275.00	0.10	27.50

Lowe, Pat (dprt)

Statement No. 236903

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Claims against INF Solutions LLC - Finder

					Rate	Hours	
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/11/2023	GM	B190	A101	Review of Initial Disclosures from Defendants.	100.00	0.50	50.00
05/18/2023	GM	B190	A101	Prepare a motion to strike jury demand along with a proposed order; confer with Randall A. Pulman regarding same.	100.00	4.50	450.00
	GM	B190	A101	Compile seventeen Finders Agreement in a new folder in tabs; verify for dates and parties to be used as exhibits.	100.00	2.00	200.00
	RAP	B190	A101	In office conference with Gaurav Mankotia regarding Motion to Strike	500.00	0.20	100.00
05/22/2023	GM	B190	A101	Continue prepare motion to strike jury demand along with an agreed order and appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	1.00	100.00
	RAP	B190	A101	Review and approve Motion to Strike, confer with Gaurav Mankotia regarding same.	500.00	0.30	150.00
				For Legal Services Rendered		38.80	5,000.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
Anna K. MacFarlane	2.80	275.00	770.00
PARA-3	3.00	110.00	330.00
Gaurav Mankotia	31.50	100.00	3,150.00

Total Current Work 5,000.00

Balance Due \$5,000.00

Lowe, Pat (dprt)

Statement No. 236903

Account No 1934.016

Claims against INF Solutions LLC - Finder

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	330.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4670.00	0.00
B100	Administration	5,000.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-39

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May 31, 2023

Invoice No. 236904
 Account No. 1934.017

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Claims against GM Consultants Group Inc - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/08/2023	PR3	B110	A110	Manage data/files - locating and saving emails	110.00	3.00	330.00
03/27/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.00	100.00
04/25/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration.	100.00	2.00	200.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default.	275.00	0.60	165.00
04/27/2023	AKM	B190	A101	Finalizing clerk's entry of default for filing.	275.00	0.30	82.50
	RAP	B190	A101	Final review and approval of request for clerk's entry of default.	500.00	0.10	50.00
	GM	B190	A101	Prepare the following: 1. Motion for Entry of Default, 2. Proposed Order, 3. RAP's Affidavit.	100.00	5.00	500.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for clerk's entry of default.	275.00	0.10	27.50

Lowe, Pat (dprt)

Statement No. 236904

Account No 1934.017

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Claims against GM Consultants Group Inc - Finder

					Rate	Hours	
05/03/2023	AKM	B190	A101	Review of draft motion for default judgment, proposed final judgment, and supporting affidavit.	275.00	0.80	220.00
	GM	B190	A101	Continue prepare default motion; review of information from USPS website; review of information regarding military background of Gregory Minear and Shelley Minear; confer with Anna regarding same; shared the same with Anna.	100.00	3.00	300.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motion.	100.00	0.50	50.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits; email Anna the same.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/10/2023	AKM	B190	A101	Confer with G. Mankotia via email and in office regarding default judgment motion interest.	275.00	1.00	275.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email			

Lowe, Pat (dprt)

Statement No. 236904

Account No 1934.017

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Claims against GM Consultants Group Inc - Finder

				Rate	Hours	
			MaryAnn the same for filing.	100.00	0.50	50.00
RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support of Motion.	500.00	0.30	150.00
			For Legal Services Rendered		21.80	3,097.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	3.70	275.00	1,017.50
PARA-3	3.00	110.00	330.00
Gaurav Mankotia	14.50	100.00	1,450.00

Advances

05/03/2023	B110	E106	Online research - TransUnion	10.00
			Total Advances	10.00
			Total Current Work	3,107.50
			Balance Due	<u>\$3,107.50</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	330.00	10.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2740.00	0.00
B100	Administration	3,097.50	10.00

Invoices are payable upon receipt.

EXHIBIT D-3:

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May 31, 2023

Invoice No. 236905
 Account No. 1934.018

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Claims against Candice Gillen - Net Winner

Fees

				Rate	Hours	
02/23/2023	AKM B190	A101	Finalizing Request for Clerk's Entry of Default for filing.	275.00	0.20	55.00
03/09/2023	AKM B190	A101	Phone call with Candice Gillen regarding settlement.	275.00	0.30	82.50
03/15/2023	AKM B190	A101	Drafting Gillen settlement agreement.	275.00	1.00	275.00
	AKM B190	A101	Email to Gillen transmitting settlement agreement for signature.	275.00	0.30	82.50
	RAP B190	A101	Review and signature of settlement letter.	500.00	0.30	150.00
03/21/2023	AKM B190	A101	Emails with Candice Gillen regarding mailing check/settlement agreement.	275.00	0.20	55.00
	AKM B190	A101	Preparing advisory to court regarding Gillen settlement.	275.00	0.50	137.50
03/23/2023	AKM B190	A101	Emails with C. Gillen regarding signed agreement and check.	275.00	0.20	55.00
04/06/2023	AKM B190	A101	Preparing 9019 motion and proposed order.	275.00	1.50	412.50
04/24/2023	AKM B190	A101	Emails with C. Gillen regarding settlement check.	275.00	0.30	82.50
			For Legal Services Rendered		4.80	1,387.50

Lowe, Pat (dprt)

Statement No. 236905

Account No 1934.018

Claims against Candice Gillen - Net Winner

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Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.30	\$500.00	\$150.00
Anna K. MacFarlane	4.50	275.00	1,237.50

Total Current Work 1,387.50

Balance Due \$1,387.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	1387.50	0.00
B100	Administration	1,387.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-3;

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May 31, 2023

Invoice No. 236906
 Account No. 1934.019

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Claims against Alice Snell - Net Winner

Fees

				Rate	Hours	
02/10/2023	AKM B180	A101	Attention to Alice Snell (phone call with Snell, writing and sending letter regarding check, confer with Randall A. Pulman regarding same).	275.00	1.00	275.00
02/23/2023	AKM B190	A101	Finalize Advisory to Court regarding receipt of check.	275.00	0.20	55.00
03/02/2023	GM B190	A101	Prepare draft of 9019 with Alice Snell along with a proposed order; email Randall A. Pulman and Anna the same.	100.00	4.00	400.00
03/03/2023	GM B190	A101	Continue prepare draft for 9019 with Alice Snell along with a proposed order; Confer with Randall A. Pulman on combining motion with Jill Winn and Carl; Edit the motion after Randall A. Pulman' suggestions. email Randall A. Pulman and Anna the same.	100.00	2.50	250.00
	RAP B190	A101	Review and draft of 9019 motion; of with Gaurav Mankotia regarding same.	500.00	0.50	250.00
	AKM B190	A101	Review and edit of 9019 motion; email with Gaurav Mankotia regarding same.	275.00	0.80	220.00
			For Legal Services Rendered		9.00	1,450.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00

Lowe, Pat (dprt)

Statement No. 236906

Account No 1934.019

Claims against Alice Snell - Net Winner

Page: 2

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	2.00	275.00	550.00
Gaurav Mankotia	6.50	100.00	650.00

Advances

02/10/2023	B110	E108	Postage - PCP	57.50
			Total Advances	57.50
			Total Current Work	1,507.50
			Balance Due	<u>\$1,507.50</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	57.50
B180	Avoidance Action Analysis	275.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1175.00	0.00
B100	Administration	1,450.00	57.50

Invoices are payable upon receipt.

EXHIBIT D-42

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May 31, 2023

Invoice No. 236907
 Account No. 1934.020

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Claims against Carl & Paula Jarnecke/Trust - Net Winners

Fees

				Rate	Hours	
02/08/2023	AKM B180	A101	Phone call (0.5) and emails (0.2) with Carl Jarnecke.	275.00	0.70	192.50
	AKM B180	A101	Confer with Randall A. Pulman regarding Jarnecke phone call and life settlement policy research.	275.00	0.20	55.00
	RAP B180	A108	Review of correspondence from Jarnecke re additional investment; office conference with AKM re same;	500.00	0.50	250.00
02/09/2023	AKM B180	A101	Confer with Randall A. Pulman and Benjamin Wulfe regarding Jarnecke situation.	275.00	0.80	220.00
	AKM B180	A101	Email to Jarnecke regarding findings.	275.00	0.50	137.50
	RAP B180	A108	Review of Janecke life settlement statement; office conference with AKM and BW re information located on contract in deeproot files;	500.00	0.50	250.00
02/13/2023	AKM B180	A101	Prepare Request for Clerk's Entry of Default against Gillen and Martins.	275.00	0.70	192.50
	AKM B180	A101	Advisory to court regarding Jarnecke check.	275.00	0.20	55.00
	AKM B180	A101	Attention to Jarnecke check issues.	275.00	0.20	55.00
02/19/2023	AKM B190	A101	Continue drafting advisory to court regarding Snell and Jarnecke checks.	275.00	0.20	55.00
02/23/2023	AKM B190	A101	Finalize Advisory to Court regarding receipt of check.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 236907

Account No 1934.020

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Claims against Carl & Paula Jarnecke/Trust - Net W

					Rate	Hours	
03/03/2023	GM	B190	A101	Prepare draft to include settlement between Carl Jarnecke and Trustee in 9019 with Jill Winn and Alice Snell; email Randall A. Pulman and Anna the same.	100.00	1.50	150.00
03/08/2023	AKM	B190	A101	Preparing dismissal notice of Jarnecke Trust.	275.00	0.20	55.00
03/09/2023	AKM	B190	A101	Prepare notice of dismissal of Jarnecke and Jarnekce Revocable Trust.	275.00	0.20	55.00
				For Legal Services Rendered		6.60	1,777.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.00	\$500.00	\$500.00
Anna K. MacFarlane	4.10	275.00	1,127.50
Gaurav Mankotia	1.50	100.00	150.00

Total Current Work 1,777.50

Balance Due \$1,777.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	1407.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	370.00	0.00
B100	Administration	1,777.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-21

PULMAN, CAPPUCINO & PULLEN, LLP

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May 31, 2023

Invoice No. 236908
 Account No. 1934.021

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Claims against D. Stein/Fidelity Mutual - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/27/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/03/2023	AKM	B190	A101	Review answer filed by Defendants.	275.00	0.20	55.00
04/13/2023	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Read through email correspondence for witness list.	100.00	3.00	300.00
04/15/2023	AKM	B190	A101	Review draft discovery and disclosures.	275.00	0.50	137.50
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00

Lowe, Pat (dprt)

Statement No. 236908

Account No 1934.021

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Claims against D. Stein/Fidelity Mutual - Finder

Rate Hours

05/24/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	2.50	250.00
				For Legal Services Rendered		10.00	1,350.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	2.00	\$275.00	\$550.00
Gaurav Mankotia	8.00	100.00	800.00

Total Current Work 1,350.00

Balance Due \$1,350.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1322.50	0.00
B100	Administration	1,350.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-22

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May 31, 2023

Invoice No. 236909
 Account No. 1934.022

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Claims against McNamara Cap. Investmt Grp - Finder

Fees

				Rate	Hours	
02/13/2023	AKM B180	A101	Prepare Request for Clerk's Entry of Default.	275.00	1.00	275.00
02/16/2023	AKM B180	A101	Continue drafting request for clerk's entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/19/2023	AKM B190	A101	Continue drafting request for clerks' entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/23/2023	AKM B190	A101	Finalizing Request for Clerk's Entry of Default for filing.	275.00	0.50	137.50
02/27/2023	AKM B190	A101	Review PACER request for clerk's entry of default; confer with MaryAnn Villa regarding filing corrected request.	275.00	0.20	55.00
03/06/2023	PR3 B110	A110	Manage data/files - locating and saving emails	110.00	0.80	88.00
03/10/2023	GM B190	A101	Prepare Motion for Default Judgment against McNamara's along with a proposed order, Randall A. Pulman's Affidavit and exhibits; review tracking of certified mails on USPS website; review details regarding military service on SCRA website.	100.00	6.00	600.00

Lowe, Pat (dprt)

Statement No. 236909

Account No 1934.022

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Claims against McNamara Cap. Investmt Grp - Find

					Rate	Hours	
03/12/2023	RAP	B190	A108	Review and edit of Motion for Default Judgment.	500.00	0.20	100.00
03/14/2023	AKM	B190	A101	Review of McNamara motion for default judgment and confer with G. Mankotia regarding same.	275.00	0.50	137.50
03/16/2023	AKM	B190	A101	Review of Motion for Default Judgment and confer with G. Mankotia regarding same.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize motion for default judgment after Anna MacFarlane's comments.	100.00	1.00	100.00
03/17/2023	RAP	B190	A107	Final review and approval of Motion for Default Judgment.	500.00	0.20	100.00
	GM	B190	A101	Continue prepare and finalize motion for default judgment; email Anna MacFarlane and Mary Ann Villa the same for filing.	100.00	0.50	50.00
03/21/2023	AKM	B190	A101	Review of hearing notice.	275.00	0.10	27.50
03/29/2023	AKM	B190	A101	Emails with John McNamara regarding address.	275.00	0.20	55.00
04/04/2023	AKM	B190	A101	Review of Motion to Reset 4/10 Hearing and proposed order.	275.00	0.30	82.50
	RAP	B190	A104	Draft settlement offer for Lowe review.	500.00	0.80	400.00
04/05/2023	AKM	B190	A101	Final review of Motion to Reset 4/10 Hearing and proposed order; filing of same.	275.00	0.30	82.50
	GM	B190	A101	Prepare Motion to Reset 4/10 Hearing and proposed order; confer with Anna regarding same; email Anna the same; Edit after Anna's suggestions; email Jamie the same for filing.	100.00	3.50	350.00
04/10/2023	AKM	B190	A101	Appear for and attend default hearing.	275.00	0.80	220.00
	RAP	B190	A104	Prepare for hearing on Motion for Default Judgment; attend hearing on Motion for Default Judgment.	500.00	0.80	400.00

Lowe, Pat (dprt)

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Statement No. 236909

Account No 1934.022

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Claims against McNamara Cap. Investmt Grp - Find

					Rate	Hours	
	GM	B190	A101	Attend default hearing.	100.00	0.30	30.00
04/25/2023	AKM	B190	A101	Prepare and mail notice of default judgment letter to defendant.	275.00	0.30	82.50
05/15/2023	GM	B190	A101	Prepare Post Judgment Discovery RFP and ROGS for Mc Namara Capital and John McNamara; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
	RAP	B190	A101	Review and signature of post judgement Discovery.	500.00	0.50	250.00
				For Legal Services Rendered		23.20	4,220.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.50	\$500.00	\$1,250.00
Anna K. MacFarlane	5.10	275.00	1,402.50
PARA-3	0.80	110.00	88.00
Gaurav Mankotia	14.80	100.00	1,480.00

Advances

03/09/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00
			Total Current Work	4,225.50

Balance Due \$4,225.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	88.00	5.00
B180	Avoidance Action Analysis	330.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	3802.50	0.00
B100	Administration	4,220.50	5.00

Invoices are payable upon receipt.

EXHIBIT D-45

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May 31, 2023

Invoice No. 236910
 Account No. 1934.023

Page: 1

Claims against PGH Advisors - Finder

Fees

				Rate	Hours	
02/01/2023	AKM B180	A101	Emails with Randall A. Pulman and Pat Lowe regarding Tippet settlement discussions.	275.00	0.20	55.00
	AKM B180	A101	Emails with Pat Lowe regarding settlement (Tippet).	275.00	0.20	55.00
	AKM B180	A101	Emails with opposing counsel regarding settlement (Tippet).	275.00	0.20	55.00
02/02/2023	AKM B180	A101	Emails with opposing counsel regarding case settled (Tippet).	275.00	0.20	55.00
	AKM B180	A101	Emails with Randall A. Pulman and Pat Lowe regarding Tippet settlement.	275.00	0.20	55.00
02/03/2023	AKM B180	A101	Preparing draft settlement agreement (Tippet).	275.00	2.00	550.00
02/06/2023	AKM B180	A101	Emails with opposing counsel regarding payment terms (Tippet).	275.00	0.30	82.50
	AKM B180	A101	Confer with Randall A. Pulman regarding payment terms (Tippet).	275.00	0.30	82.50
	AKM B180	A101	Confer with Randall A. Pulman regarding amendment to Hopman complaint.	275.00	0.10	27.50
	AKM B180	A101	Emails with Leslie S. Hyman regarding PGH amendment.	275.00	0.20	55.00
	RAP B180	A105	Confer with Anna K. MacFarlane regarding Tippet payment terms and Hopman complaint.	500.00	0.40	200.00
02/07/2023	AKM B180	A101	Emails with opposing counsel regarding			

Lowe, Pat (dprt)

Statement No. 236910

Account No 1934.023

Page: 2

Claims against PGH Advisors - Finder

				Rate	Hours	
			payment plan terms (Tippett).	275.00	0.30	82.50
	AKM B180	A101	Continue drafting settlement agreement and draft agreed judgment as security for payment (Tippett).	275.00	1.00	275.00
	AKM B180	A101	Continue drafting PGH First Amended Complaint per Leslie S. Hyman comments and edits.	275.00	0.40	110.00
	AKM B180	A101	Confer with Randall A. Pulman regarding PGH Amended complaint.	275.00	0.10	27.50
	AKM B180	A101	Continue drafting Tippett Settlement Agreement and agreed judgment per Randall A. Pulman comments and edits.	275.00	0.30	82.50
	RAP B180	A108	Office conference with AKM re settlement terms; review and edit of settlement agreement and judgment;	500.00	0.30	150.00
02/08/2023	AKM B180	A101	Emails with Tippett counsel regarding settlement.	275.00	0.30	82.50
	AKM B180	A101	Finalizing settlement drafts for Brian Laird review.	275.00	0.20	55.00
	RAP B180	A108	Review of Settlement Agreement and Agreed Judgment;	500.00	0.30	150.00
02/09/2023	AKM B180	A101	Confer with Randall A. Pulman regarding amended complaint.	275.00	0.20	55.00
	AKM B180	A101	Drafting amended complaint.	275.00	3.00	825.00
	AKM B180	A101	Emails with Brian Laird.	275.00	0.30	82.50
	RAP B180	A105	Confer with Anna K. MacFarlane regarding amended complaint.	500.00	0.20	100.00
02/10/2023	PR3 B110	A110	Manage data/files - finding and saving emails	110.00	2.50	275.00
	AKM B180	A101	Continue drafting amended complaint per Randall A. Pulman comments and edits.	275.00	4.00	1,100.00
	AKM B180	A101	Review of edits from opposing counsel (Tippett settlement).	275.00	0.20	55.00
	AKM B180	A101	Emails with Laird regarding settlement agreement revisions (Tippett).	275.00	0.40	110.00
	AKM B180	A101	Confer with Randall A. Pulman regarding Laird revisions (Tippett).	275.00	0.10	27.50
	AKM B180	A101	Confer with Randall A. Pulman regarding amended complaint.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 236910

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Claims against PGH Advisors - Finder

					Rate	Hours	
	RAP	B190	A104	Review of amended complaint; office conference with A. MacFarlane regarding same; final review for filing.	500.00	1.00	500.00
02/14/2023	AKM	B180	A101	Attention to Tippet settlement agreement, including emails with opposing counsel and finalizing agreement and exhibits for execution.	275.00	1.50	412.50
	AKM	B180	A101	Review of Robert Mueller emails in Hopman file.	275.00	1.50	412.50
02/17/2023	AKM	B190	A101	Emails with opposing counsel regarding answer/response deadline.	275.00	0.20	55.00
02/19/2023	AKM	B190	A101	Email to Brian Laird regarding signed settlement agreement.	275.00	0.10	27.50
02/21/2023	AKM	B190	A101	Review draft stipulation prepared by opposing counsel (Hopman Defendants) (0.2); email to opposing counsel regarding same (0.1).	275.00	0.30	82.50
02/22/2023	AKM	B190	A101	Review of updated draft stipulation and approval of same.	275.00	0.30	82.50
03/02/2023	GM	B190	A101	Prepare draft of 9019 with MARICO TIPPETT, AND CWB INVESTMENT ADVISORS, LLC along with proposed orders.	100.00	2.00	200.00
03/12/2023	RAP	B190	A108	Review and edit of 9019 Motion for Settlement.	500.00	0.20	100.00
03/13/2023	AKM	B190	A101	Confer via phone and email with Tippet attorney regarding draft 9019 Motion.	275.00	0.20	55.00
03/15/2023	AKM	B190	A101	Email to PGH et al counsel regarding filed Tippet/CWB 9019.	275.00	0.10	27.50
	RAP	B190	A108	Review of Notice of Default from court; internal e-mail regarding settlement with defendants.	500.00	0.20	100.00

Lowe, Pat (dprt)

Statement No. 236910

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Claims against PGH Advisors - Finder

					Rate	Hours	
03/20/2023	PR3	B110	A110	Manage data/files - Searching for and saving emails	110.00	2.80	308.00
03/29/2023	AKM	B190	A101	Emails with Brian Laird regarding settlement payment.	275.00	0.20	55.00
04/10/2023	AKM	B190	A101	Research notice of claim procedure against Arizona Corporation Commission.	275.00	1.00	275.00
	AKM	B190	A101	Review of 26(a) disclosures.	275.00	0.60	165.00
	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; segregated emails on netdocs; Read through 503 emails for witness list.	100.00	3.00	300.00
04/11/2023	AKM	B190	A101	Continue review of 26(a) disclosures and confer with G. Mankotia regarding same.	275.00	0.30	82.50
	AKM	B190	A101	Attention to 9019 order with Tippet.	275.00	0.20	55.00
	AKM	B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
	GM	B190	A101	Continue prepare Initial Disclosures and Request for Production of Documents and reading through 503 emails for witness list; confer with Anna regarding same; email Anna the same.	100.00	8.00	800.00
04/12/2023	AKM	B190	A101	Review of RFPs to Pam Hopman, Paul Hopman, PGH Advisors, MP Wealth Management, and the Hopman Trust.	275.00	2.00	550.00
	GM	B190	A101	Continue prepare and amend five Request for Productions.	100.00	3.00	300.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00

Lowe, Pat (dprt)

Statement No. 236910

Account No 1934.023

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Claims against PGH Advisors - Finder

				Rate	Hours	
05/08/2023	AKM B190	A101	Email to Brian Laird regarding MaRico Tippet settlement payments.	275.00	0.10	27.50
05/10/2023	AKM B190	A101	Email from Brian Laird regarding Tippet payments.	275.00	0.10	27.50
05/15/2023	AKM B190	A101	Emails with opposing counsel regarding discovery issues and conferral regarding joint motion to extend scheduling order deadlines.	275.00	0.30	82.50
05/17/2023	AKM B190	A101	Email from opposing counsel regarding agreeing to extending scheduling order deadlines.	275.00	0.10	27.50
	AKM B190	A101	Drafting joint motion to extend scheduling order deadlines and agreed scheduling order.	275.00	0.80	220.00
05/30/2023	AKM B190	A101	Emails with opposing counsel regarding deposition dates and draft extension motion.	275.00	0.30	82.50
	AKM B190	A101	Confer with Randall A. Pulman regarding case.	275.00	0.20	55.00
	AKM B190	A101	Research regarding notice of claim (0.4); phone call with Legal Division of Arizona Corporation Commission regarding process (0.3); email to securities division regarding process (0.3).	275.00	1.00	275.00
05/31/2023	AKM B190	A101	Emails with opposing counsel regarding Motion to Extend Scheduling Order Deadlines and discovery.	275.00	0.30	82.50
			For Legal Services Rendered		51.90	11,140.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.80	\$500.00	\$1,400.00
Anna K. MacFarlane	27.30	275.00	7,507.50
PARA-3	5.30	110.00	583.00
Gaurav Mankotia	16.50	100.00	1,650.00

Advances

03/22/2023	B110	E108	Postage - Service on Ltd Svc list for 9019 - Blend Document Technologies #57141B	3,336.47
			Total Advances	3,336.47
			Total Current Work	14,476.97
			Balance Due	<u>\$14,476.97</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	583.00	3336.47
B180	Avoidance Action Analysis	5522.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	5035.00	0.00
B100	Administration	11,140.50	3,336.47

Invoices are payable upon receipt.

EXHIBIT D-46

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May 31, 2023

Invoice No. 236911
 Account No. 1934.024

Page: 1

Claims against Jacob Proux - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/13/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	0.40	44.00
03/01/2023	GM	B190	A101	Legal research concerning whether the chapter 7 discharge order applies to creditors that the debtor did not notice in his bankruptcy case; Prepared a note regarding same; email Anna MacFarlane the same.	100.00	4.00	400.00
	AKM	B190	A101	Review of research regarding dischargeability and emails regarding same.	275.00	0.60	165.00
03/02/2023	AKM	B190	A101	Conduct legal research regarding dischargeability and confer with Randall A. Pulman regarding same.	275.00	1.00	275.00
	RAP	B190	A101	Review of bankruptcy schedules for defendants; e-mail to P. Lowe regarding decision not to pursue.	500.00	0.60	300.00
03/08/2023	AKM	B190	A101	Prepare dismissal notice.	275.00	0.20	55.00
03/27/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/07/2023	AKM	B190	A101	Finalizing dismissal notice for filing.	275.00	<u>0.20</u>	<u>55.00</u>

Lowe, Pat (dprt)

Statement No. 236911

Account No 1934.024

Page: 2

Claims against Jacob Proux - Finder

	Rate	Hours	
For Legal Services Rendered		8.60	1,471.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	2.10	275.00	577.50
PARA-3	0.40	110.00	44.00
Gaurav Mankotia	5.50	100.00	550.00

Total Current Work	1,471.50
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Balance Due	<u>\$1,471.50</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	44.00	0.00
B180 Avoidance Action Analysis	27.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	1400.00	0.00
B100 Administration	1,471.50	0.00

Invoices are payable upon receipt.

EXHIBIT D-47

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May 31, 2023

Invoice No. 236912
 Account No. 1934.025

Page: 1

Claims against John M Vizy - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/13/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	0.20	22.00
03/27/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00
	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration.	100.00	3.00	300.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for clerk's entry of default.	275.00	0.10	27.50
05/03/2023	AKM	B190	A101	Review of draft motion for default judgment, proposed final judgment, and supporting affidavit.	275.00	0.80	220.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default			

Lowe, Pat (dprt)

Statement No. 236912

Account No 1934.025

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Claims against John M Vizy - Finder

					Rate	Hours	
				motions.	100.00		0.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
	RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support of Motion	500.00	0.30	150.00
				For Legal Services Rendered		10.70	1,732.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	2.40	275.00	660.00
PARA-3	0.20	110.00	22.00
Gaurav Mankotia	7.50	100.00	750.00

Advances

05/02/2023	B110	E106	Online research - TransUnion	15.00
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Lowe, Pat (dprt)

Statement No. 236912

Account No 1934.025

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Claims against John M Vizy - Finder

Total Advances 15.00

Total Current Work 1,747.00

Balance Due \$1,747.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	22.00	15.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1682.50	0.00
B100	Administration	1,732.00	15.00

Invoices are payable upon receipt.

EXHIBIT'D-48

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May 31, 2023

Invoice No. 236913
 Account No. 1934.026

Page: 1

Claims against Mark Zabinski - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
03/01/2023	AKM B190	A101	Attention to emails with Zabinski counsel regarding extending answer deadline.	275.00	0.30	82.50
	AKM B190	A101	Preparing stipulation per firm formatting and language; send to opposing counsel for review.	275.00	0.50	137.50
04/03/2023	RAP B190	A104	Review of 12(b)(6) Motion.	500.00	0.20	100.00
04/05/2023	LSH B120	A104	Review/analyze motion to dismiss.	450.00	0.80	360.00
04/06/2023	AKM B190	A101	Office conference with Leslie S. Hyman regarding motion to dismiss and emails regarding same.	275.00	0.30	82.50
	LSH B120	A105	Communicate (in firm) with A. MacFarlane regarding merits of motion to dismiss.	450.00	0.20	90.00
04/11/2023	LSH B120	A103	Draft/revise response to motion to dismiss and conduct legal research regarding same.	450.00	2.90	1,305.00
04/14/2023	RAP B190	A104	Review of response to 12(b)(6) motion; office conference with A. MacFarlane regarding same.	500.00	0.40	200.00
04/16/2023	AKM B190	A101	Review response to motion to dismiss and review cited case law.	275.00	1.00	275.00

Lowe, Pat (dprt)

Statement No. 236913

Account No 1934.026

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Claims against Mark Zabinski - Finder

					Rate	Hours	
04/17/2023	AKM B190	A101	Final review of response to motion to dismiss; oversee filing of same.		275.00	0.50	137.50
05/01/2023	AKM B190	A101	Attend Motion to Dismiss hearing via phone.		275.00	0.60	165.00
	AKM B190	A101	Confer with Randall A. Pulman regarding amending complaint per Judge's order.		275.00	0.30	82.50
	RAP B190	A101	Prepare for hearing; review of Motion to Dismiss; response and original compliant; office conference with A. MacFarlane regarding same.		500.00	2.00	1,000.00
	RAP B190	A101	Attend hearing on Motion to Dismiss - granted in part.		500.00	2.00	1,000.00
	GM B190	A101	Review of 12(b)(6) Motion and answer to the Motion.		100.00	2.00	200.00
	GM B190	A101	Attend Motion to Dismiss hearing.		100.00	1.00	100.00
05/02/2023	AKM B190	A101	Confer with Randall A. Pulman regarding amending complaint.		275.00	0.20	55.00
05/03/2023	AKM B190	A101	Begin drafting amended complaint.		275.00	0.40	110.00
	AKM B190	A101	Confer with G. Mankotia regarding review of proofs of claim.		275.00	0.20	55.00
05/09/2023	AKM B190	A101	Continue drafting first amended complaint and reviewing proofs of claim for anchoring creditor paragraph.		275.00	0.60	165.00
05/10/2023	AKM B190	A101	Confer with Randall A. Pulman regarding draft first amended complaint and review of same.		275.00	0.20	55.00
	RAP B190	A101	Review and edit of First Amended Complaint; conference call with Anna MacFarlane regarding same.		500.00	0.50	250.00
05/15/2023	AKM B190	A101	Continue drafting first amended complaint per Randall A. Pulman comments and edits; confer with Randall A. Pulman in-office regarding same.		275.00	0.50	137.50
			For Legal Services Rendered			17.70	6,172.50

Lowe, Pat (dprt)

Statement No. 236913

Account No 1934.026

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Claims against Mark Zabinski - Finder

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	5.10	\$500.00	\$2,550.00
Anna K. MacFarlane	5.70	275.00	1,567.50
Gaurav Mankotia	3.00	100.00	300.00
Leslie Hyman	3.90	450.00	1,755.00

Total Current Work 6,172.50

Balance Due \$6,172.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B120	Asset Analysis and Recovery	1755.00	0.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4390.00	0.00
B100	Administration	6,172.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-49

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May 31, 2023

Invoice No. 236914
 Account No. 1934.027

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Metropolitan CMB/Wiley Carter - Finder

Fees

				Rate	Hours	
02/13/2023	AKM B180	A101	Prepare Request for Clerk's Entry of Default.	275.00	0.70	192.50
02/16/2023	AKM B180	A101	Continue drafting request for clerk's entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/19/2023	AKM B190	A101	Continue drafting request for clerks' entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/23/2023	AKM B190	A101	Finalizing Request for Clerk's Entry of Default for filing.	275.00	0.50	137.50
02/27/2023	AKM B190	A101	Review of Entry of Default.	275.00	0.10	27.50
02/28/2023	PR3 B110	A110	Manage data/files - searching for and saving emails	110.00	2.30	253.00
03/08/2023	GM B190	A101	Prepare motion for default judgment against Metropolitan CMB and Carter along with a proposed order, RAP's Affidavit and exhibits; reviewed delivery of post on USPS website; reviewed whether defendants are in active service from SCRA website.	100.00	7.00	700.00
03/16/2023	AKM B190	A101	Review of Motion for Default Judgment and emails with G. Mankotia regarding			

Lowe, Pat (dprt)

Statement No. 236914

Account No 1934.027

Metropolitan CMB/Wiley Carter - Finder

Page: 2

					Rate	Hours	
				same.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize motion for default judgment after Anna's comments.	100.00	1.00	100.00
03/17/2023	RAP	B190	A107	Final review and approval of Motion for Default Judgment.	500.00	0.20	100.00
	GM	B190	A101	Continue prepare and finalize motion for default judgment; email Anna and Mary Ann the same.	100.00	0.50	50.00
03/21/2023	AKM	B190	A101	Review of hearing notice.	275.00	0.10	27.50
04/04/2023	AKM	B190	A101	Review of Motion to Reset 4/10 Hearing and proposed order.	275.00	0.30	82.50
04/05/2023	AKM	B190	A101	Final review of Motion to Reset 4/10 Hearing and proposed order; filing of same.	275.00	0.30	82.50
	GM	B190	A101	Prepare Motion to Reset 4/10 Hearing and proposed order; confer with Anna regarding same; email Anna the same; Edit after Anna's suggestions; email Jamie the same for filing.	100.00	3.50	350.00
04/10/2023	AKM	B190	A101	Appear for and attend default hearing.	275.00	0.30	82.50
	RAP	B190	A104	Prepare for hearing on Motion for Default Judgment; attend hearing on Motion for Default Judgment.	500.00	0.80	400.00
	GM	B190	A101	Attend default hearing.	100.00	0.30	30.00
04/19/2023	AKM	B190	A101	Attention to service issues.	275.00	0.30	82.50
05/15/2023	RAP	B190	A104	Hearing on Motion for Default Judgment.	500.00	1.00	500.00
05/16/2023	GM	B190	A101	Prepare Post Judgment Discovery ROGS and RFP's for Wiley Calvin Carer and Metropolitan CMG, LLC	100.00	4.00	400.00
05/17/2023	GM	B190	A101	Continue prepare Post Judgment Discovery ROGS and RFP's; confer with Randall A. Pulman regarding same; email MaryAnn final drafts for filing.	100.00	1.50	150.00

Lowe, Pat (dprt)

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Account No 1934.027

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Metropolitan CMB/Wiley Carter - Finder

	Rate	Hours	
RAP B190 A101 Final review and signature of post judgement discovery	500.00	0.20	100.00
For Legal Services Rendered		25.80	4,095.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	2.20	\$500.00	\$1,100.00
Anna K. MacFarlane	3.50	275.00	962.50
PARA-3	2.30	110.00	253.00
Gaurav Mankotia	17.80	100.00	1,780.00

Advances

03/08/2023	B110	E106	Online research - TransUnion	5.00
04/10/2023	B110	E106	Online research - TransUnion	25.00
04/19/2023	B110	E124	Service of process - Hill Country Litigation Services #8619	100.00
			Total Advances	130.00
			Total Current Work	4,225.50

Balance Due	<u>\$4,225.50</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	253.00	130.00
B180 Avoidance Action Analysis	247.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	3595.00	0.00
B100 Administration	4,095.50	130.00

Invoices are payable upon receipt.

EXHIBIT'D-4:

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May 31, 2023

Invoice No. 236915
 Account No. 1934.028

Page: 1

Claims against Purpose Driven Fin. Svcs - Finder

Fees

				Rate	Hours	
02/03/2023	AKM B180	A101	Phone call and emails with Stuart Hunsicker regarding his lack of involvement during the relevant time period.	275.00	0.30	82.50
02/13/2023	AKM B180	A101	Prepare Request for Clerk's Entry of Default.	275.00	0.70	192.50
	AKM B180	A101	Finalizing dismissal of Hunsicker to file before default.	275.00	0.10	27.50
02/16/2023	AKM B180	A101	Continue drafting request for clerk's entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/17/2023	AKM B190	A101	Attention to Hunsicker dismissal.	275.00	0.10	27.50
02/23/2023	AKM B190	A101	Finalizing Request for Clerk's Entry of Default for filing.	275.00	0.50	137.50
02/27/2023	AKM B190	A101	Review of Entry of Default.	275.00	0.10	27.50
03/02/2023	PR3 B110	A110	Manage data/files - searching and saving emails	110.00	0.30	33.00
03/06/2023	GM B190	A101	Prepare draft of default judgment along with proposed order, affidavit and exhibits; review and analyze the pleadings.	100.00	3.00	300.00

Lowe, Pat (dprt)

Statement No. 236915

Account No 1934.028

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Claims against Purpose Driven Fin. Svcs - Finder

					Rate	Hours	
03/07/2023	GM	B190	A101	Continue prepare draft of default judgment along with proposed order, affidavit and exhibits; confer with Anna MacFarlane on TLO search; extract details from SCRA to check whether the defendants fall under that category; confer with Randall A. Pulman regarding same.	100.00	7.00	700.00
03/16/2023	AKM	B190	A101	Review of Motion for Default Judgment and emails with G. Mankotia regarding same.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize motion for default judgment after Anna MacFarlane's comments.	100.00	1.00	100.00
03/17/2023	RAP	B190	A107	Final review and approval of Motion for Default Judgment.	500.00	0.20	100.00
	GM	B190	A101	Continue prepare and finalize motion for default judgment; email Anna MacFarlane and Mary Ann Villa the same.	100.00	0.50	50.00
04/04/2023	AKM	B190	A101	Review of Motion to Reset 4/10 Hearing and proposed order.	275.00	0.30	82.50
04/05/2023	AKM	B190	A101	Final review of Motion to Reset 4/10 Hearing and proposed order; filing of same.	275.00	0.30	82.50
	GM	B190	A101	Prepare Motion to Reset 4/10 Hearing and proposed order; confer with Anna regarding same; email Anna the same; Edit after Anna's suggestions; email Jamie the same for filing.	100.00	3.00	300.00
04/10/2023	AKM	B190	A101	Appear for and attend default hearing.	275.00	0.30	82.50
	RAP	B190	A104	Prepare for hearing on Motion for Default Judgment; attend hearing on Motion for Default Judgment.	500.00	0.80	400.00
	GM	B190	A101	Attend default hearing.	100.00	0.30	30.00
04/25/2023	AKM	B190	A101	Prepare and mail notice of default judgment letter to defendant.	275.00	0.30	82.50

Lowe, Pat (dprt)

Statement No. 236915

Account No 1934.028

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Claims against Purpose Driven Fin. Svcs - Finder

					Rate	Hours	
05/15/2023	GM	B190	A101	Prepare Post Judgment Discovery RFP and ROGS to Purpose Driven Financial Services and Zaheer Razack; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
	RAP	B190	A101	Review and signature of post judgement discovery	500.00	0.20	100.00
				For Legal Services Rendered		23.50	3,480.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.20	\$500.00	\$600.00
Anna K. MacFarlane	3.70	275.00	1,017.50
PARA-3	0.30	110.00	33.00
Gaurav Mankotia	18.30	100.00	1,830.00

Advances

03/07/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00
			Total Current Work	3,485.50

Balance Due \$3,485.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	33.00	5.00
B180	Avoidance Action Analysis	357.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	3090.00	0.00
B100	Administration	3,480.50	5.00

Invoices are payable upon receipt.

EXHIBIT'D-4;

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May 31, 2023

Invoice No. 236916
 Account No. 1934.029

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Claims against Premier Group Enterpr. - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/24/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default.	275.00	0.60	165.00
	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration.	100.00	3.00	300.00
04/27/2023	AKM	B190	A101	Finalizing clerk's entry of default for filing.	275.00	0.30	82.50
	RAP	B190	A101	Final review and approval of request for clerk's entry of default.	500.00	0.10	50.00
04/28/2023	GM	B190	A101	Prepare the following: 1. Motion for Entry of Default, 2. Proposed Order, 3. RAP's Affidavit	100.00	5.00	500.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for clerk's entry of default.	275.00	0.10	27.50
05/03/2023	GM	B190	A101	Continue prepare default motion; review of information from USPS website;			

Lowe, Pat (dprt)

Statement No. 236916

Account No 1934.029

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Claims against Premier Group Enterpr. - Finder

					Rate	Hours	
				review of military background of Anthony Lotts from SCRA website; confer with Anna regarding same; share the same with Anna.	100.00	4.00	400.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motions.	100.00		0.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
	RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support of Motion	500.00	0.30	150.00
05/31/2023	AKM	B190	A101	Phone call with Defendant; settlement reached.	275.00	0.30	82.50
	AKM	B190	A101	Confer with Randall A. Pulman regarding how to handle default motion hearing after settlement.	275.00	0.10	27.50
	RAP	B190	A101	Confer with Anna MacFarlane regarding default motion hearing and settlement.	500.00	<u>0.10</u>	<u>50.00</u>

Lowe, Pat (dprt)

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Claims against Premier Group Enterpr. - Finder

	Rate	Hours	
For Legal Services Rendered		19.50	2,632.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.70	\$500.00	\$350.00
Anna K. MacFarlane	2.30	275.00	632.50
Gaurav Mankotia	16.50	100.00	1,650.00

Advances

05/04/2023	B110	E106	Online research - TransUnion	5.00
Total Advances				5.00

Total Current Work	2,637.50
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Balance Due	<u>\$2,637.50</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	5.00
B180 Avoidance Action Analysis	27.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	2605.00	0.00
B100 Administration	2,632.50	5.00

Invoices are payable upon receipt.

EXHIBIT'D-52

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May 31, 2023

Invoice No. 236917
 Account No. 1934.030

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Claims against Dennis Wirth, Agent Advisory Group

Fees

				Rate	Hours	
02/02/2023	AKM	B180	A101	Prepare Rule 26(a) disclosures and serve same on opposing counsel.	275.00	0.80 220.00
	AKM	B180	A101	Finalizing Notice of Dismissal of Agent Advisory Group for filing.	275.00	0.20 55.00
	AKM	B180	A101	Confer with Randall A. Pulman regarding disclosures.	275.00	0.10 27.50
	RAP	B180	A104	Review and approval of disclosures.	500.00	0.20 100.00
02/10/2023	RAP	B180	A108	Telephone conference with defense counsel re status;	500.00	0.50 250.00
02/13/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	1.90 209.00
03/03/2023	RAP	B190	A101	Review of proposed changes to scheduling order; e-mail to opposing counsel regarding same.	500.00	0.30 150.00
04/03/2023	GM	B190	A101	Prepare Supplementary 26(a) Disclosures; Read through 365 emails for witness list.	100.00	4.00 400.00
04/04/2023	GM	B190	A101	Continue prepare 26(a) Supplementary Disclosures; Read through 365 emails for witness list; confer with Anna regarding same; email Anna the same.	100.00	4.00 400.00
04/06/2023	GM	B190	A101	Prepare Written Discovery.	100.00	5.00 500.00
04/07/2023	AKM	B190	A101	Review of supplemental disclosures.	275.00	0.50 137.50

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Claims against Dennis Wirth, Agent Advisory Grou

					Rate	Hours	
04/11/2023	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
	RAP	B190	A101	Review and edit Rule 26 Disclosures and Requests for production.	500.00	0.20	100.00
04/17/2023	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.50	137.50
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/23/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
				For Legal Services Rendered		24.60	3,616.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.40	\$500.00	\$700.00
Anna K. MacFarlane	3.30	275.00	907.50
PARA-3	1.90	110.00	209.00
Gaurav Mankotia	18.00	100.00	1,800.00

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Claims against Dennis Wirth, Agent Advisory Grou

Total Current Work 3,616.50

Balance Due \$3,616.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	209.00	0.00
B180	Avoidance Action Analysis	652.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2755.00	0.00
B100	Administration	3,616.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-53

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May 31, 2023

Invoice No. 236918
 Account No. 1934.031

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Claims against Michael Cales - Finder

Fees

					Rate	Hours	
02/13/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	1.70	187.00
03/09/2023	GM	B190	A101	Prepare RFP for Michael Cales; confer with Randall A. Pulman; Edit RFP after Randall A. Pulman's edits.	100.00	4.00	400.00
	RAP	B190	A108	Review and edit of document requests; office conference with G. Mankotia regarding same.	500.00	0.50	250.00
03/10/2023	GM	B190	A101	Continue prepare RFP for Cales after Randall A. Pulman's suggestions; confer with Randall A. Pulman regarding same.	100.00	1.00	100.00
03/12/2023	GM	B190	A101	Continue prepare RFP for Cales after Randall A. Pulman's edits; confer with Randall A. Pulman regarding same.	100.00	0.30	30.00
	RAP	B190	A108	Review and approve of document request to Defendant Cales.	500.00	0.10	50.00
03/13/2023	GM	B190	A101	Amend final draft of RFP after Anna's edits; confer with Anna and Jamie regarding same.	100.00	0.20	20.00
	AKM	B190	A101	Review of draft RFPs.	275.00	0.30	82.50
03/28/2023	AKM	B190	A101	Emails with Greg Hauswirth regarding agreed orders extending scheduling deadlines.	275.00	0.20	55.00

Lowe, Pat (dprt)

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Claims against Michael Cales - Finder

					Rate	Hours	
03/29/2023	AKM	B190	A101	Drafting motion to amend scheduling order and proposed amended scheduling order.	275.00	1.00	275.00
04/02/2023	GM	B190	A101	Prepare Supplementary 26(a) disclosures; Read through 131 emails for Witness List.	100.00	3.00	300.00
04/03/2023	GM	B190	A101	Continue prepare Supplementary 26(a) disclosures.	100.00	3.50	350.00
04/04/2023	GM	B190	A101	Continue prepare 26(a) Supplementary Disclosures; confer with Anna regarding same; email Anna the same.	100.00	1.00	100.00
04/07/2023	AKM	B190	A101	Review of supplemental disclosures.	275.00	0.50	137.50
04/11/2023	AKM	B190	A101	Emails with opposing counsel regarding motions to amend scheduling order.	275.00	0.20	55.00
	AKM	B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Finalizing Motion to Amend Scheduling Order for filing.	275.00	0.50	137.50
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures.	100.00	0.50	50.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
04/25/2023	AKM	B190	A101	Phone call with opposing counsel regarding extension of discovery response deadline to May 3.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendant.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00

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Claims against Michael Cales - Finder

					Rate	Hours	
05/11/2023	GM	B190	A101	Review of initial disclosures from Defendant.	100.00	0.50	50.00
05/24/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.00	300.00
				For Legal Services Rendered		23.60	3,239.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.80	\$500.00	\$400.00
Anna K. MacFarlane	3.10	275.00	852.50
PARA-3	1.70	110.00	187.00
Gaurav Mankotia	18.00	100.00	1,800.00

Total Current Work 3,239.50

Balance Due \$3,239.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	187.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	3052.50	0.00
B100	Administration	3,239.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-54

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May 31, 2023

Invoice No. 236919
 Account No. 1934.032

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Claims against George M Villa - Finder

Fees

				Rate	Hours	
02/13/2023	AKM B180	A101	Prepare Request for Clerk's Entry of Default.	275.00	0.80	220.00
	PR3 B110	A110	Manage data/files - locating and saving emails to ND	110.00	2.10	231.00
02/16/2023	AKM B180	A101	Continue drafting request for clerk's entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/19/2023	AKM B190	A101	Continue drafting request for clerks' entry of default per Randall A. Pulman comments and edits.	275.00	0.20	55.00
02/23/2023	AKM B190	A101	Finalizing Request for Clerk's Entry of Default for filing.	275.00	0.50	137.50
02/27/2023	AKM B190	A101	Review of Entry of Default.	275.00	0.10	27.50
	RAP B190	A104	Review of Motion for Default Judgment.	500.00	0.50	250.00
03/01/2023	GM B190	A101	Prepare draft for default judgment along with a proposed order, Randall A. Pulman's affidavit and exhibits; Confer with Randall A. Pulman, Anna MacFarlane, Mary Ann Villa regarding same; Searched on USPS website to track delivery of mail; Searched on Dept. of Def. website to check if George M Villa served in the military; Confer with Katy Vidales regarding same; email Randall A.			

Lowe, Pat (dprt)

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Claims against George M Villa - Finder

					Rate	Hours	
				Pulman and Anna MacFarlane the draft of default judgment along with a proposed order, Randall A. Pulman's affidavit and exhibits.	100.00	8.00	800.00
03/02/2023	LSH	B120	A103	Continue drafting motion for default judgment.	450.00	2.50	1,125.00
03/03/2023	GM	B190	A101	Continue prepare draft of default judgment along with a proposed order; review Leslie S. Hyman comments and markings. confer with Randall A. Pulman regarding same; edit motion and exhibits.	100.00	3.00	300.00
	RAP	B190	A101	Review and edit of draft of Motion for Default Judgment.	500.00	0.20	100.00
03/06/2023	GM	B190	A101	Confer with Randall A. Pulman regarding edits in the motion for default judgment; Edited same.	100.00	0.50	50.00
03/07/2023	GM	B190	A101	Amend draft of default judgment; confer with Randall A. Pulman regarding same.	100.00	0.50	50.00
03/08/2023	AKM	B190	A101	Reviewing Villa default for filing.	275.00	0.30	82.50
04/04/2023	AKM	B190	A101	Preparing Motion to Reset 4/10 Hearing and proposed order.	275.00	0.50	137.50
04/05/2023	AKM	B190	A101	Final review of Motion to Reset 4/10 Hearing and proposed order; filing of same.	275.00	0.30	82.50
04/10/2023	AKM	B190	A101	Appear for and attend default hearing.	275.00	0.30	82.50
	RAP	B190	A104	Prepare for hearing on Motion for Default Judgment; attend hearing on Motion for Default Judgment.	500.00	0.80	400.00
04/25/2023	AKM	B190	A101	Prepare and mail notice of default judgment letter to defendant.	275.00	0.30	82.50
05/12/2023	GM	B190	A101	Prepare Post Judgment Discovery; confer with Randall A. Pulman regarding same;			

Lowe, Pat (dprt)

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Account No 1934.032

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Claims against George M Villa - Finder

					Rate	Hours	
				email Randall A. Pulman the same.	100.00	4.00	400.00
05/15/2023	GM	B190	A101	Continue prepare Post Judgment Discovery RFP and ROGS for George M Villa; confer with Randall A. Pulman regarding same.	100.00	1.00	100.00
05/16/2023	GM	B190	A101	Research for turnover receiver and collection of judgment through court proceedings from Texas and Illinois statute.	100.00	3.00	300.00
				For Legal Services Rendered		29.60	5,068.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.50	\$500.00	\$750.00
Anna K. MacFarlane	3.50	275.00	962.50
PARA-3	2.10	110.00	231.00
Gaurav Mankotia	20.00	100.00	2,000.00
Leslie Hyman	2.50	450.00	1,125.00

Advances

03/01/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00

Total Current Work 5,073.50

Balance Due \$5,073.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	231.00	5.00
B120	Asset Analysis and Recovery	1125.00	0.00
B180	Avoidance Action Analysis	275.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	3437.50	0.00
B100	Administration	5,068.50	5.00

Lowe, Pat (dprt)

Statement No. 236919

Account No 1934.032

Claims against George M Villa - Finder

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Invoices are payable upon receipt.

EXHIBIT'D-55

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May 31, 2023

Invoice No. 236920
 Account No. 1934.033

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Claims against Randy Seymour - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/06/2023	AKM	B180	A101	Confer with Randall A. Pulman regarding phone call with Randy Seymour.	275.00	0.10	27.50
	RAP	B180	A108	Telephone conference with with Mr. Seymour re filing of lawsuit;	500.00	0.30	150.00
02/13/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	0.60	66.00
03/24/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/14/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	8.00	800.00
04/15/2023	AKM	B190	A101	Review of request for clerk's entry of default.	275.00	0.50	137.50
04/18/2023	AKM	B190	A101	Review of motion for default judgment.	275.00	3.00	825.00
04/19/2023	AKM	B190	A101	Continue drafting default packet per Randall A. Pulman comments and edits.	275.00	1.00	275.00
	AKM	B190	A101	Confer with Randall A. Pulman regarding default packet and prejudgment interest.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 236920

Account No 1934.033

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Claims against Randy Seymour - Finder

					Rate	Hours	
04/25/2023	AKM	B190	A101	Continue review of default judgment packet and emails with G. Mankotia regarding same.	275.00	1.00	275.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for clerk's entry of default.	275.00	0.10	27.50
	GM	B190	A101	Continue prepare and amend default motion after Anna's comments.	100.00	2.00	200.00
05/03/2023	AKM	B190	A101	Review of draft motion for default judgment, proposed final judgment, and supporting affidavit.	275.00	0.80	220.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motions.	100.00	0.50	50.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall			

Lowe, Pat (dprt)

Statement No. 236920

Account No 1934.033

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Claims against Randy Seymour - Finder

					Rate	Hours	
				A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
	RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support of Motion	500.00	0.30	150.00
				For Legal Services Rendered		24.70	4,271.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.90	\$500.00	\$450.00
Anna K. MacFarlane	8.20	275.00	2,255.00
PARA-3	0.60	110.00	66.00
Gaurav Mankotia	15.00	100.00	1,500.00

Advances

04/14/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00
			Total Current Work	4,276.00

Balance Due \$4,276.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	66.00	5.00
B180	Avoidance Action Analysis	205.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4000.00	0.00
B100	Administration	4,271.00	5.00

Invoices are payable upon receipt.

EXHIBIT'D-56

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May 31, 2023

Invoice No. 236921
 Account No. 1934.034

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Claims against Raul T Gomez - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/13/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	0.80	88.00
03/24/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/17/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	6.00	600.00
04/25/2023	AKM	B190	A101	Review of request for clerk's default and default judgment motion.	275.00	2.50	687.50
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
	AKM	B190	A101	Review of default motion; confer with G. Mankotia regarding same.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare default motion; confer			

Lowe, Pat (dprt)

Statement No. 236921

Account No 1934.034

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Claims against Raul T Gomez - Finder

					Rate	Hours	
				with Anna regarding same; email Anna the same.	100.00	3.00	300.00
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for clerk's entry of default.	275.00	0.10	27.50
	GM	B190	A101	continue prepare and amend default motion after Anna's comments.	100.00	2.00	200.00
	GM	B190	A101	Continue prepare and amend default motion after Anna's comments.	100.00	2.00	200.00
05/03/2023	AKM	B190	A101	Review of draft motion for default judgment, proposed final judgment, and supporting affidavit.	275.00	0.80	220.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motions.	100.00	0.50	50.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
	RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support			

Lowe, Pat (dprt)

Statement No. 236921

Account No 1934.034

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Claims against Raul T Gomez - Finder

	Rate	Hours	
of Motion.	500.00	0.30	150.00
For Legal Services Rendered		24.80	3,673.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	5.40	275.00	1,485.00
PARA-3	0.80	110.00	88.00
Gaurav Mankotia	18.00	100.00	1,800.00

Advances

04/17/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00

Total Current Work	3,678.00
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Balance Due	<u>\$3,678.00</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	88.00	5.00
B180 Avoidance Action Analysis	27.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	3557.50	0.00
B100 Administration	3,673.00	5.00

Invoices are payable upon receipt.

EXHIBIT'D-57

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May 31, 2023

Invoice No. 236922
 Account No. 1934.035

Page: 1

Claims against RD and J, Inc. - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B190	A101	Prepare Rule 26(a) disclosures and serve same on opposing counsel.	275.00	0.80	220.00
	AKM B190	A101	Confer with Randall A. Pulman regarding disclosures.	275.00	0.10	27.50
	RAP B190	A104	Review and approval of disclosures.	500.00	0.20	100.00
03/02/2023	PR3 B110	A110	Manage data/files - searching and saving emails	110.00	2.30	253.00
04/08/2023	GM B190	A101	Prepare 26(a) Disclosures and Request for production of Documents. Segregated email correspondence on netdocs; Read through 316 email correspondence for witness list.	100.00	3.00	300.00
04/13/2023	GM B190	A101	Continue prepare Rule 26 Disclosures and Request for Production of Documents and witness list.	100.00	6.00	600.00
04/14/2023	AKM B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	AKM B190	A101	Review draft discovery and disclosures.	275.00	0.50	137.50
	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM B190	A101	Final review of discovery requests; putting in final for service on opposing			

Lowe, Pat (dprt)

Statement No. 236922

Account No 1934.035

Page: 2

Claims against RD and J, Inc. - Finder

					Rate	Hours	
				counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/22/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
	RAP	B190	A101	Office Conference with Gaurav Mankotia regarding Motion to Strike.	500.00	0.20	100.00
05/24/2023	LSH	B190	A103	Draft/revise motion to strike jury demand.	450.00	0.90	405.00
05/25/2023	GM	B190	A101	Continue prepare motion to strike jury demand after Leslie S. Hyman's comments, confer with Leslie S. Hyman regarding same.	100.00	4.00	400.00
	GM	B190	A101	Research for case laws on jury waiver.	100.00	1.00	100.00
05/30/2023	GM	B190	A101	Continue prepare and amend motion to strike jury demand; confer with Leslie S. Hyman regarding same.	100.00	3.00	300.00
05/31/2023	GM	B190	A101	Continue prepare and amend motion to strike jury demand; multiple conferences with Leslie S. Hyman; confer with Randall A. Pulman regarding same.	100.00	6.00	600.00
	LSH	B190	A103	Continue drafting motion to strike jury demand.	450.00	1.30	585.00
	LSH	B190	A102	Legal research regarding motion to strike jury demand.	450.00	0.60	270.00

Lowe, Pat (dprt)

Statement No. 236922

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Claims against RD and J, Inc. - Finder

	Rate	Hours	
RAP B190 A101 Office conference with Gaurav Mankotia; review Motion to strike jury demand.	500.00	0.20	100.00
For Legal Services Rendered		36.90	5,493.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	3.20	275.00	880.00
PARA-3	2.30	110.00	253.00
Gaurav Mankotia	28.00	100.00	2,800.00
Leslie Hyman	2.80	450.00	1,260.00

Advances

04/18/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00

Total Current Work	5,498.00
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Balance Due	<u>\$5,498.00</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	253.00	5.00
B190 Other Contested Matters (excluding assumption/rejection motions)	5240.00	0.00
B100 Administration	5,493.00	5.00

Invoices are payable upon receipt.

EXHIBIT'D-58

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May 31, 2023

Invoice No. 236923
 Account No. 1934.036

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Claims against David Rosen - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/08/2023	PR3	B110	A110	Manage data/files - searching and saving emails	110.00	0.50	55.00
02/24/2023	AKM	B190	A101	Attention to returned US mail.	275.00	0.10	27.50
03/02/2023	PR3	B110	A110	Manage data/files - searching and saving emails	110.00	2.00	220.00
03/24/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
03/31/2023	AKM	B190	A101	Conference with Randall A. Pulman regarding returned mail and service issues; additional research regarding defendant.	275.00	0.50	137.50
	RAP	B180	A105	Confer with Anna K. MacFarlane regarding service issues; additional research.	500.00	0.30	150.00
04/05/2023	AKM	B190	A101	Confer with Randall A. Pulman regarding service issues.	275.00	0.10	27.50
04/26/2023	AKM	B190	A101	Attention to service issues.	275.00	0.20	55.00
05/03/2023	AKM	B190	A101	Finalizing motion to vacate order to seek default for filing.	275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 236923
Account No 1934.036
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Claims against David Rosen - Finder

					Rate	Hours	
05/11/2023	AKM	B190	A101	Phone call with David Rosen.	275.00	0.20	55.00
05/30/2023	AKM	B190	A101	Attention to service issues.	275.00	0.20	55.00
				For Legal Services Rendered		5.90	1,015.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.30	\$500.00	\$150.00
Anna K. MacFarlane	1.60	275.00	440.00
PARA-3	2.50	110.00	275.00
Gaurav Mankotia	1.50	100.00	150.00

Advances

03/20/2023	B110	E106	Online research - TransUnion	10.00
03/31/2023	B110	E106	Online research - TransUnion	30.00
			Total Advances	40.00

Total Current Work 1,055.00

Balance Due \$1,055.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	275.00	40.00
B180	Avoidance Action Analysis	177.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	562.50	0.00
B100	Administration	1,015.00	40.00

Invoices are payable upon receipt.

EXHIBIT'D-59

**No fees or
expenses in
this matter**

EXHIBIT'D-5:

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May 31, 2023

Invoice No. 236924
 Account No. 1934.038

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Claims against Crissman Crombie

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
02/27/2023	AKM B190	A101	VM from Crissman Crombie regarding receipt of complaint (0.1); confer with MaryAnn Villa regarding returning call (0.1); review of email regarding return phone call (0.1).	275.00	0.30	82.50
03/28/2023	GM B190	A101	Drafted RFP and 26(a) disclosure; analysed e-mail correspondence and segregated the relevant emails; created folders and stacked the documents accordingly; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	5.00	500.00
03/29/2023	AKM B190	A101	Review of draft 26(a) disclosures and RFPs.	275.00	0.50	137.50
	AKM B190	A101	In-office conference with Randall A. Pulman regarding proof of claim.	275.00	0.20	55.00
	AKM B190	A101	Office conference with G. Mankotia regarding disclosures.	275.00	0.20	55.00
	GM B190	A101	Continue prepare initial disclosure and RFPs after Anna MacFarlane's comments; Searched for proof of claims for Crissman Crombie and Tracie Bush; Multiple emails with Anna MacFarlane regarding same;	100.00	4.00	400.00
	RAP B190	A101	Review and approval of 26(a) disclosures.	500.00	0.30	150.00

Lowe, Pat (dprt)

Statement No. 236924

Account No 1934.038

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Claims against Crissman Crombie

				Rate	Hours	
03/31/2023	AKM	B190	A101			
			Finalizing Rule 26(a) disclosures and RFPs for mailout to Criss Crombie, pro se defendant.	275.00	1.00	275.00
			For Legal Services Rendered		11.60	1,682.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.30	\$500.00	\$150.00
Anna K. MacFarlane	2.30	275.00	632.50
Gaurav Mankotia	9.00	100.00	900.00

Total Current Work 1,682.50

Balance Due \$1,682.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1655.00	0.00
B100	Administration	1,682.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-5;

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May 31, 2023

Invoice No. 236925
 Account No. 1934.039

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Claims against Agents Insur. Sales & Svc - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/03/2023	AKM	B190	A101	Review of Court's order to seek default.	275.00	0.10	27.50
03/06/2023	PR3	B110	A110	Manage data/files - locating and saving emails	110.00	0.80	88.00
03/22/2023	GM	B190	A101	Office conference with B. Wulfe regarding setting up collabspace on netdocs.	100.00	1.00	100.00
	GM	B190	A101	Continue prepare initial disclosures; segregate emails and exhibits; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	4.00	400.00
03/23/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
03/27/2023	AKM	B190	A101	Continue reviewing draft 26(a) disclosures and RFPs and emails with G. Mankotia regarding same.	275.00	1.00	275.00
03/29/2023	AKM	B190	A101	Review of initial disclosures, RFPs, and draft request for clerk's entry of default.	275.00	1.50	412.50
03/31/2023	AKM	B190	A101	Office conferences with Randall A. Pulman and Elliott S. Cappuccio regarding settlement payment methods.	275.00	0.30	82.50
	RAP	B190	A105	Review and signature of Motion for clerk			

Lowe, Pat (dprt)

Statement No. 236925

Account No 1934.039

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Claims against Agents Insur. Sales & Svc - Finder

					Rate	Hours	
				to enter default's notice.	500.00	0.20	100.00
04/07/2023	AKM B190	A101	Review of RFP and initial disclosures to Barry Wilken.		275.00	0.50	137.50
04/11/2023	AKM B190	A101	Final review of initial disclosures.		275.00	0.10	27.50
	RAP B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.		500.00	0.20	100.00
04/15/2023	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.		100.00	0.50	50.00
04/21/2023	GM B190	A101	Continue prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit		100.00	5.00	500.00
04/26/2023	AKM B190	A101	Attention to hearing scheduling issues.		275.00	0.30	82.50
04/27/2023	AKM B190	A101	Drafting motion to extend time to file motion for default judgment and proposed order; confer with Randall A. Pulman regarding same; oversee filing of same.		275.00	1.50	412.50
04/28/2023	AKM B190	A101	Uploading amended order.		275.00	0.20	55.00
05/01/2023	AKM B190	A101	Emails to/from Barry Wilken regarding hiring attorney, hearing, and settlement.		275.00	0.30	82.50
05/02/2023	AKM B190	A101	Emails to/from Barry Wilken regarding settlement.		275.00	0.30	82.50
05/17/2023	AKM B190	A101	Drafting witness and exhibit list for hearing; confer with Leslie S. Hyman and MaryAnn Villa regarding same.		275.00	0.50	137.50
	AKM B190	A101	Attention to settlement correspondence (Obmann).		275.00	0.20	55.00

Lowe, Pat (dprt)

Statement No. 236925

Account No 1934.039

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Claims against Agents Insur. Sales & Svc - Finder

					Rate	Hours	
	LSH	B120	A101	Identify exhibits for hearing on motion for entry of clerk's default.	450.00	0.60	270.00
05/19/2023	LSH	B120	A101	Prepare for hearing on motion for entry of clerk's default.	450.00	0.20	90.00
05/21/2023	LSH	B120	A101	Prepare for hearing on motion for entry of clerk's default.	450.00	0.50	225.00
05/22/2023	LSH	B120	A109	Attend hearing on motion for entry of clerk's default.	450.00	1.20	540.00
	LSH	B120	A105	Conference with R. Pulman regarding outcome of hearing on motion for entry of clerk's default and next steps.	450.00	0.20	90.00
05/30/2023	AKM	B190	A101	Emails with Barry Wilken; settlement reached.	275.00	0.40	110.00
05/31/2023	AKM	B190	A101	Draft settlement agreement.	275.00	1.00	275.00
				For Legal Services Rendered		24.20	4,985.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.40	\$500.00	\$200.00
Anna K. MacFarlane	8.30	275.00	2,282.50
PARA-3	0.80	110.00	88.00
Gaurav Mankotia	12.00	100.00	1,200.00
Leslie Hyman	2.70	450.00	1,215.00

Advances

05/24/2023	B110	E124	Parq King - Parking	22.00
			Total Advances	22.00
			Total Current Work	5,007.50
			Balance Due	<u>\$5,007.50</u>

Lowe, Pat (dprt)

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Statement No. 236925

Account No 1934.039

Claims against Agents Insur. Sales & Svc - Finder

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	88.00	22.00
B120	Asset Analysis and Recovery	1215.00	0.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	3655.00	0.00
B100	Administration	4,985.50	22.00

Invoices are payable upon receipt.

EXHIBIT D-40

**No fees or
expenses in
this matter**

EXHIBIT D-41

**No fees or
expenses in
this matter**

EXHIBIT D-44

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May 31, 2023

Invoice No. 236926
 Account No. 1934.042

Page: 1

Claims against Shantell Wright - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/23/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/21/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	3.00	300.00
04/24/2023	GM	B190	A101	Continue prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	2.00	200.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for			

Lowe, Pat (dprt)

Statement No. 236926

Account No 1934.042

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Claims against Shantell Wright - Finder

					Rate	Hours	
				clerk's entry of default.	275.00	0.10	27.50
	AKM	B190	A101	Begin review of default judgment motion, proposed order, and affidavit.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and amend default motion after Anna's comments.	100.00	2.00	200.00
05/03/2023	AKM	B190	A101	Review of draft motion for default judgment, proposed final judgment, and supporting affidavit.	275.00	0.80	220.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motions.	100.00	0.50	50.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
	RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support of Motion.	500.00	0.30	150.00
				For Legal Services Rendered		15.50	2,297.50

Lowe, Pat (dprt)

Statement No. 236926

Account No 1934.042

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Claims against Shantell Wright - Finder

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	2.90	275.00	797.50
Gaurav Mankotia	12.00	100.00	1,200.00

Advances

04/24/2023	B110	E106	Online research - TransUnion	5.00
			Total Advances	5.00

Total Current Work	2,302.50
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Balance Due	<u>\$2,302.50</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	5.00
B180 Avoidance Action Analysis	27.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	2270.00	0.00
B100 Administration	2,297.50	5.00

Invoices are payable upon receipt.

EXHIBIT D-45

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May 31, 2023

Invoice No. 236927
 Account No. 1934.043

Page: 1

Claims against Steven Fortier - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/23/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/20/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	3.00	300.00
04/25/2023	GM	B190	A101	Continue prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	2.00	200.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for			

Lowe, Pat (dprt)

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Statement No. 236927

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Claims against Steven Fortier - Finder

					Rate	Hours	
				clerk's entry of default.	275.00	0.10	27.50
	AKM	B190	A101	Review of motion for default judgment, proposed order, and affidavit.	275.00	1.00	275.00
	GM	B190	A101	Continue prepare and amend default motion after Anna's comments.	100.00	2.00	200.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motions.	100.00	0.50	50.00
05/08/2023	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
				For Legal Services Rendered		14.90	2,065.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.30	\$500.00	\$150.00
Anna K. MacFarlane	2.60	275.00	715.00
Gaurav Mankotia	12.00	100.00	1,200.00

Lowe, Pat (dprt)

Statement No. 236927

Account No 1934.043

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Claims against Steven Fortier - Finder

Advances

04/25/2023	B110	E106	Online research - TransUnion	5.00
05/12/2023	B110	E106	Online research - TransUnion	25.00
Total Advances				30.00

Total Current Work 2,095.00

Balance Due \$2,095.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	30.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2037.50	0.00
B100	Administration	2,065.00	30.00

Invoices are payable upon receipt.

EXHIBIT'D-66

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May 31, 2023

Invoice No. 236928
 Account No. 1934.044

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Claims against David Obman - Finder

Fees

				Rate	Hours	
02/10/2023	AKM B180	A101	Phone call with David Obmann.	275.00	0.60	165.00
03/20/2023	AKM B190	A101	Review of Rule 26(a) disclosures to Obmann and Wilken.	275.00	1.00	275.00
	AKM B190	A101	Office conference with G. Mankotia regarding Rule 26(a) disclosures.	275.00	0.20	55.00
	GM B190	A101	Prepare initial disclosures to Obmann and Wilken; office conference with Anna MacFarlane regarding same; email Anna MacFarlane the same; confer with Randall A. Pulman regarding same.	100.00	8.00	800.00
03/21/2023	AKM B190	A101	Continue review of 26(a) disclosures.	275.00	0.50	137.50
	GM B190	A101	Continue prepare initial disclosures after Anna's comments; confer with Anna regarding same; email Anna the same.	100.00	0.60	60.00
03/22/2023	AKM B190	A101	Continue review of 26(a) disclosures and review of draft RFPs.	275.00	1.50	412.50
	AKM B190	A101	Office conference with G. Mankotia regarding documents to produce with disclosures.	275.00	0.20	55.00
03/23/2023	AKM B190	A101	Phone call with D. Obmann.	275.00	0.20	55.00
03/28/2023	GM B190	A101	Continue prepare initial disclosures; RFP's for Wilken and Obmann; Letter regarding default; request for entry of default by clerk and Randall A. Pulman'			

Lowe, Pat (dprt)

Statement No. 236928

Account No 1934.044

Claims against David Obman - Finder

Page: 2

					Rate	Hours	
				declaration. Multiple office conference with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	6.00	600.00
03/30/2023	AKM	B190	A101	Emails to/from David Obmann regarding settlement offer and transmitting settlement letter agreement.	275.00	0.50	137.50
03/31/2023	RAP	B190	A105	Office conference with A. MacFarlane regarding settlement offer; telephone conference with Lowe regarding payments by credit card; review settlement agreement.	500.00	0.50	250.00
	AKM	B180	A105	Confer with Randall A. Pulman regarding settlement offer.	275.00	0.20	55.00
	AKM	B190	A101	Multiple emails with David Obmann regarding settlement.	275.00	0.50	137.50
	AKM	B190	A101	Phone call with Randall A. Pulman and Pat Lowe regarding settlement with Obmann.	275.00	0.10	27.50
04/04/2023	AKM	B190	A101	Email and phone call with David Obmann.	275.00	0.30	82.50
04/10/2023	AKM	B190	A101	Emails with David Obmann regarding settlement terms.	275.00	0.30	82.50
04/18/2023	AKM	B190	A101	Multiple emails with David Obmann regarding settlement.	275.00	0.30	82.50
04/20/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	5.00	500.00
04/24/2023	AKM	B190	A101	Emails with David Obmann regarding settlement payments.	275.00	0.20	55.00
04/25/2023	AKM	B190	A101	Prepare 9019 motion to approve compromise with David Obmann.	275.00	1.50	412.50

Lowe, Pat (dprt)

Statement No. 236928

Account No 1934.044

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Claims against David Obman - Finder

				Rate	Hours	
04/27/2023	AKM	B190	A101			
			Emails with David Obmann regarding			
			second settlement payment.	275.00	0.20	55.00
			For Legal Services Rendered		28.40	4,492.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.50	\$500.00	\$250.00
Anna K. MacFarlane	8.30	275.00	2,282.50
Gaurav Mankotia	19.60	100.00	1,960.00

Total Current Work 4,492.50

Balance Due \$4,492.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	220.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	4272.50	0.00
B100	Administration	4,492.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-67

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May 31, 2023

Invoice No. 236929
 Account No. 1934.045

Page: 1

Claims against Scott Nazarino - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
02/24/2023	AKM B190	A101	Attention to returned US mail.	275.00	0.10	27.50
03/31/2023	AKM B190	A101	Conference with Randall A. Pulman regarding returned mail and service issues; additional research regarding defendant.	275.00	0.50	137.50
	RAP B180	A105	Confer with Anna K. MacFarlane regarding service issues.	500.00	0.20	100.00
04/05/2023	AKM B190	A101	Confer with Randall A. Pulman regarding getting reissued summons.	275.00	0.10	27.50
04/26/2023	AKM B190	A101	Attention to service issues.	275.00	0.30	82.50
05/01/2023	AKM B190	A101	Drafting motion to vacate order to seek default based still attempting service.	275.00	0.50	137.50
05/02/2023	AKM B190	A101	Continue drafting motion to vacate order and proposed order regarding same.	275.00	0.30	82.50
	AKM B190	A101	Confer with Randall A. Pulman regarding motion to vacate.	275.00	0.10	27.50
	RAP B190	A101	Confer with A. MacFarlane regarding motion to vacate.	500.00	0.10	50.00
05/03/2023	AKM B190	A101	Finalizing motion to vacate order to seek default for filing.	275.00	<u>0.20</u>	<u>55.00</u>

Lowe, Pat (dprt)

Statement No. 236929

Account No 1934.045

Page: 2

Claims against Scott Nazarino - Finder

	Rate	Hours	
For Legal Services Rendered		2.50	755.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.30	\$500.00	\$150.00
Anna K. MacFarlane	2.20	275.00	605.00

Advances

03/20/2023	B110	E106	Online research - TransUnion	25.00
03/31/2023	B110	E106	Online research - TransUnion	25.00
Total Advances				50.00

Total Current Work	805.00
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Balance Due	<u>805.00</u>
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Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	0.00	50.00
B180 Avoidance Action Analysis	127.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	627.50	0.00
B100 Administration	755.00	50.00

Invoices are payable upon receipt.

EXHIBIT'D-68

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May 31, 2023

Invoice No. 236930
 Account No. 1934.046

Page: 1

Claims against Senior Insurance Services - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
02/06/2023	AKM B180	A101	Voicemail from Eric Rudd.	275.00	0.10	27.50
03/16/2023	AKM B190	A101	Review of documents for disclosures and confer with G. Mankotia regarding same.	275.00	0.20	55.00
04/07/2023	AKM B190	A101	Review of RFP and initial disclosures.	275.00	0.50	137.50
	AKM B190	A101	Review of letter regarding corporate pro se representation.	275.00	0.50	137.50
	GM B190	A101	Prepare 26 Disclosures, Request for Production of Documents and Letter regarding Pro Se representation. Read through email correspondence for witness list.	100.00	5.00	500.00
04/11/2023	AKM B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
04/15/2023	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/18/2023	AKM B190	A101	Multiple emails and phone calls with defendant regarding settlement.	275.00	0.50	137.50
04/24/2023	AKM B190	A101	Emails with Eric Rudd regarding settlement.	275.00	0.20	55.00
04/27/2023	AKM B190	A101	Emails with defendant regarding			

Lowe, Pat (dprt)

Statement No. 236930
Account No 1934.046
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Claims against Senior Insurance Services - Finder

					Rate	Hours	
				settlement.	275.00	0.20	55.00
05/01/2023	AKM B190	A101	Email from Eric Rudd.		275.00	0.10	27.50
	GM B190	A101	Prepare 1. Notice regarding Pro Se representation, 2. request for clerk's entry of default and 3. Randall A. Pulman's declaration; review of postal information from USPS website; confer with Anna regarding same; email Anna the same.		100.00	4.00	400.00
05/02/2023	AKM B190	A101	Emails/vm from Eric Rudd regarding settlement amount.		275.00	0.20	55.00
05/03/2023	AKM B190	A101	Draft settlement letter agreement.		275.00	0.50	137.50
	AKM B190	A101	Confer with Randall A. Pulman regarding final settlement agreement.		275.00	0.10	27.50
	AKM B190	A101	Email to Defendant with settlement agreement and instructions to print, sign, and mail back with check.		275.00	0.20	55.00
	RAP B190	A101	Review and signature of settlement letter.		500.00	0.20	100.00
05/08/2023	AKM B190	A101	Attention to settlement check and signed agreement; email to Rudd regarding receipt of same.		275.00	0.20	55.00
	AKM B190	A101	Drafting 9019 Motion.		275.00	1.00	275.00
			For Legal Services Rendered			14.40	2,342.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	4.70	275.00	1,292.50
Gaurav Mankotia	9.50	100.00	950.00

Total Current Work 2,342.50

Balance Due \$2,342.50

Lowe, Pat (dprt)

Statement No. 236930

Account No 1934.046

Claims against Senior Insurance Services - Finder

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	55.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2287.50	0.00
B100	Administration	2,342.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-69

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May 31, 2023

Invoice No. 236931
 Account No. 1934.047

Page: 1

Claims against Safe Money Solutions - Finder

Fees

					Rate	Hours	
03/06/2023	PR3	B110	A110	Manage data/files - locating and saving emails	110.00	1.10	121.00
03/13/2023	GM	B190	A101	Prepare initial disclosures per 26(a); confer with Anna MacFarlane regarding same; look for documents on net-docs; email same the Anna MacFarlane.	100.00	2.50	250.00
04/07/2023	AKM	B190	A101	Review of RFP and initial disclosures.	275.00	0.50	137.50
	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; segregated emails on netdocs; Read through 126 emails for witness list.	100.00	6.00	600.00
04/11/2023	AKM	B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/14/2023	AKM	B190	A101	Draft Motion to Amend Scheduling Order for filing.	275.00	0.60	165.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00

Lowe, Pat (dprt)

Statement No. 236931
Account No 1934.047
Page: 2

Claims against Safe Money Solutions - Finder

					Rate	Hours	
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/15/2023	LSH	B120	A105	Conference with R. Pulman and A. MacFarlane regarding motion for summary judgment.	450.00	0.40	180.00
05/23/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
05/25/2023	LSH	B120	A103	Begin drafting motion for summary judgment.	450.00	1.60	720.00
05/30/2023	AKM	B190	A101	Office conference and emails with Leslie S. Hyman regarding Motion for Summary Judgment.	275.00	0.30	82.50
	LSH	B120	A105	Conference with team regarding potential illegality of contract argument.	450.00	0.50	225.00
	LSH	B120	A102	Legal research regarding argument that the finder contract is illegal.	450.00	2.40	1,080.00
05/31/2023	LSH	B120	A103	Continue drafting motion for summary judgment.	450.00	3.10	1,395.00
				For Legal Services Rendered		24.90	5,748.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	2.10	275.00	577.50
PARA-3	1.10	110.00	121.00
Gaurav Mankotia	13.50	100.00	1,350.00
Leslie Hyman	8.00	450.00	3,600.00

Lowe, Pat (dprt)

Statement No. 236931

Account No 1934.047

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Claims against Safe Money Solutions - Finder

Total Current Work 5,748.50

Balance Due \$5,748.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	121.00	0.00
B120	Asset Analysis and Recovery	3600.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2027.50	0.00
B100	Administration	5,748.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-6:

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May 31, 2023

Invoice No. 236932
 Account No. 1934.048

Page: 1

Claims against CWB Investment Advisors - Finder

Fees

				Rate	Hours	
02/21/2023	AKM B190	A101	Continue drafting settlement agreement to include CWB Investments (0.2); email to opposing counsel regarding same (0.1).	275.00	0.30	82.50
02/22/2023	AKM B190	A101	Multiple emails regarding Tippet/CWB Settlement.	275.00	0.60	165.00
03/04/2023	GM B190	A101	Prepare draft of 9019 along with a proposed order; email Randall A. Pulman and Anna the same.	100.00	3.00	300.00
03/09/2023	GM B190	A101	Amend 9019 after Anna's edits; confer with Anna regarding same.	100.00	0.50	50.00
	AKM B190	A101	Continue drafting 9019 Motion with Tippet and CWB Investment.	275.00	0.50	137.50
	RAP B190	A108	Review and edit of 9019 Motion.	500.00	0.20	100.00
03/10/2023	GM B190	A101	Amend 9019 after Randall A. Pulman's edits; confer with Randall A. Pulman regarding same.	100.00	0.80	80.00
03/15/2023	AKM B190	A101	Continue drafting Tippet/CWB 9019 Motion and finalizing for filing.	275.00	0.80	220.00
	AKM B190	A101	Emails with opposing counsel regarding 9019 and filing advisory regarding default order.	275.00	0.30	82.50
03/16/2023	AKM B190	A101	Preparing advisory to court regarding CWB and Tippet settlement.	275.00	0.30	82.50

Lowe, Pat (dprt)

Statement No. 236932

Account No 1934.048

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Claims against CWB Investment Advisors - Finder

				Rate	Hours	
05/01/2023	AKM	B190	A101			
			Review of notice and affidavit regarding attempted service at Peg Oak address.	275.00	0.20	55.00
			For Legal Services Rendered		7.50	1,355.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	3.00	275.00	825.00
Gaurav Mankotia	4.30	100.00	430.00

Total Current Work 1,355.00

Balance Due \$1,355.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	1355.00	0.00
B100	Administration	1,355.00	0.00

Invoices are payable upon receipt.

EXHIBIT'D-6;

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May 31, 2023

Invoice No. 236933
 Account No. 1934.049

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Claims against Dianne McClish - Finder

Fees

				Rate	Hours	
03/09/2023	AKM B190	A101	Attention to correspondence regarding received check.	275.00	0.50	137.50
03/10/2023	AKM B190	A101	Voicemail for Dianne McClish regarding needing signed letter agreement.	275.00	0.10	27.50
	AKM B190	A101	Review of fax signed letter agreement.	275.00	0.10	27.50
03/15/2023	AKM B190	A101	Attention to various emails regarding check.	275.00	0.60	165.00
			For Legal Services Rendered		1.30	357.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anna K. MacFarlane	1.30	\$275.00	\$357.50

Total Current Work	357.50
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Balance Due	<u>\$357.50</u>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	357.50	0.00
B100	Administration	357.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-72

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May 31, 2023

Invoice No. 236934
 Account No. 1934.050

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Claims against Blanchard & Associates - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
03/03/2023	PR3	B110	A110	Manage data/files - searching and saving emails	110.00	0.70	77.00
03/22/2023	AKM	B190	A101	Review of answer.	275.00	0.20	55.00
04/13/2023	GM	B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Segregated email correspondence on netdocs; Read through 86 emails for witness list.	100.00	3.00	300.00
04/15/2023	AKM	B190	A101	Review draft discovery and disclosures.	275.00	0.50	137.50
04/16/2023	AKM	B190	A101	Continue review of draft discovery and disclosures.	275.00	0.50	137.50
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
	AKM	B190	A101	Continue drafting Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.40	110.00
04/18/2023	AKM	B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50

Lowe, Pat (dprt)

Statement No. 236934

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Claims against Blanchard & Associates - Finder

					Rate	Hours	
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/24/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	2.50	250.00
	RAP	B190	A101	Office Conference with Gaurav Mankotia regarding Motion to strike.	500.00	0.20	100.00
				For Legal Services Rendered		9.90	1,514.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	2.50	275.00	687.50
PARA-3	0.70	110.00	77.00
Gaurav Mankotia	6.50	100.00	650.00

Total Current Work 1,514.50

Balance Due \$1,514.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	77.00	0.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1410.00	0.00
B100	Administration	1,514.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-73

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May 31, 2023

Invoice No. 236935
 Account No. 1934.051

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Claims against Azar Parchami - Finder

Fees

					Rate	Hours	
03/13/2023	GM	B190	A101	Prepare draft initial disclosure per 26(a); confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	2.50	250.00
03/14/2023	AKM	B190	A101	Review of initial disclosures.	275.00	0.20	55.00
03/21/2023	AKM	B190	A101	Review of initial disclosures.	275.00	0.60	165.00
	GM	B190	A101	Continue prepare initial disclosure after Anna MacFarlane's edits; confer with Anna MacFarlane regarding same; email Anna MacFarlane the same.	100.00	2.00	200.00
04/07/2023	AKM	B190	A101	Review of RFP and initial disclosures.	275.00	0.50	137.50
04/11/2023	AKM	B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP	B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/24/2023	AKM	B190	A101	Preparing letter to Azar Parchami regarding proposed scheduling order amendments.	275.00	0.50	137.50
05/04/2023	AKM	B190	A101	Voicemail and emails with Azar Parchami			

Lowe, Pat (dprt)

Statement No. 236935
Account No 1934.051
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Claims against Azar Parchami - Finder

				Rate	Hours	
			regarding settlement.	275.00	0.30	82.50
	AKM B190	A101	Review of email from A. Parchami.	275.00	0.10	27.50
05/08/2023	AKM B190	A101	Emails to/from Azar Parchami.	275.00	0.20	55.00
05/12/2023	AKM B190	A101	Multiple emails and telephone calls with Azar Parchami regarding settlement.	275.00	0.50	137.50
	AKM B190	A101	Preparing settlement letter agreement and emailing to Azar Parchami for signature.	275.00	1.00	275.00
	RAP B190	A101	Review and signature of settlement letter.	500.00	0.20	100.00
			For Legal Services Rendered		9.40	1,800.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.40	\$500.00	\$200.00
Anna K. MacFarlane	4.00	275.00	1,100.00
Gaurav Mankotia	5.00	100.00	500.00

Total Current Work 1,800.00

Balance Due \$1,800.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	1800.00	0.00
B100	Administration	1,800.00	0.00

Invoices are payable upon receipt.

EXHIBIT'D-74

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May 31, 2023

Invoice No. 236936
 Account No. 1934.052

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Great Lakes Wealth Management - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Confer with Randall A. Pulman regarding Olson attorney phone call.	275.00	0.10	27.50
	RAP B180	A105	Confer with Anna K. MacFarlane regarding Olson attorney phone call.	500.00	0.10	50.00
02/20/2023	AKM B180	A101	Draft new letter agreement and transmit to attorney.	275.00	1.00	275.00
			For Legal Services Rendered		1.20	352.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.10	\$500.00	\$50.00
Anna K. MacFarlane	1.10	275.00	302.50

Total Current Work 352.50

Balance Due \$352.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	352.50	0.00
B100	Administration	352.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-75

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May 31, 2023

Invoice No. 236937
 Account No. 1934.053

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Claims against Domonic Cotton - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
03/02/2023	AKM B190	A101	Review of Defendant's answer.	275.00	0.20	55.00
04/06/2023	GM B190	A101	Plan and prepare Rule 26 Disclosures and Request for Production of Documents; Read through email correspondence for witness list.	100.00	6.00	600.00
04/07/2023	AKM B190	A101	Review of RFP and initial disclosures.	275.00	0.50	137.50
04/11/2023	AKM B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
04/15/2023	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM B190	A101	Draft Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.60	165.00
04/18/2023	AKM B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50
05/01/2023	AKM B190	A101	Review of initial disclosures from Defendants.	275.00	0.10	27.50

Lowe, Pat (dprt)

Statement No. 236937

Account No 1934.053

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Claims against Domonic Cotton - Finder

					Rate	Hours	
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/23/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.50	350.00
				For Legal Services Rendered		12.90	1,667.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	1.70	275.00	467.50
Gaurav Mankotia	11.00	100.00	1,100.00

Total Current Work 1,667.50

Balance Due \$1,667.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1640.00	0.00
B100	Administration	1,667.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-76

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May 31, 2023

Invoice No. 236938
 Account No. 1934.054

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Claims against Fleming Financial Services Inc - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
02/24/2023	AKM B190	A101	Emails with opposing counsel regarding answer date extension to March 17.	275.00	0.20	55.00
02/28/2023	AKM B190	A101	Review stipulation and order from opposing counsel regarding answer deadline extension.	275.00	0.20	55.00
	AKM B190	A101	Emails with opposing counsel regarding answer deadline extension.	275.00	0.30	82.50
03/03/2023	PR3 B110	A110	Manage data/files - searching and saving emails	110.00	1.80	198.00
03/14/2023	RAP B190	A107	Review of settlement offer; respond to same and arguments on the merits.	500.00	2.00	1,000.00
03/16/2023	AKM B190	A101	Review of settlement letter from opposing counsel and Randall A. Pulman response to same.	275.00	0.50	137.50
03/17/2023	AKM B190	A101	Review of Defendant's answer.	275.00	0.20	55.00
04/10/2023	GM B190	A101	Prepare 26 (a) Disclosures and Request for Production of Documents; segregated 298 email correspondence on netdocs; Read through 298 emails for witness list.	100.00	4.00	400.00
04/12/2023	GM B190	A101	Continue prepare Rule 26 Disclosures and			

Lowe, Pat (dprt)

Statement No. 236938

Account No 1934.054

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Claims against Fleming Financial Services Inc - Fin

					Rate	Hours	
				Request for Production of Documents and witness list.	100.00	2.00	200.00
04/15/2023	GM	B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/16/2023	AKM	B190	A101	Review of draft discovery and disclosures.	275.00	0.50	137.50
04/17/2023	AKM	B190	A101	Final review of discovery requests; putting in final for service on opposing counsel; serving discovery on opposing counsel via e-mail.	275.00	0.60	165.00
05/03/2023	AKM	B190	A101	Review of settlement communication and documents.	275.00	0.50	137.50
	RAP	B190	A101	Review of settlement offer at 60%; forward to client.	500.00	0.20	100.00
05/04/2023	AKM	B190	A101	Review of emails regarding Fleming Financial settlement.	275.00	0.20	55.00
05/05/2023	RAP	B190	A101	Review of financial information; compare to pleading; e-mail to opposing counsel regarding offer.	500.00	1.00	500.00
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/16/2023	AKM	B190	A101	Attention to emails requesting one-week extension for document production.	275.00	0.20	55.00
05/22/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.00	300.00
				For Legal Services Rendered		19.00	3,810.50

Lowe, Pat (dprt)

Statement No. 236938

Account No 1934.054

Claims against Fleming Financial Services Inc - Fin

Page: 3

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	3.20	\$500.00	\$1,600.00
Anna K. MacFarlane	3.50	275.00	962.50
PARA-3	1.80	110.00	198.00
Gaurav Mankotia	10.50	100.00	1,050.00

Total Current Work 3,810.50

Balance Due \$3,810.50

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	198.00	0.00
B180 Avoidance Action Analysis	27.50	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	3585.00	0.00
B100 Administration	3,810.50	0.00

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EXHIBIT'D-75

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May 31, 2023

Invoice No. 236939
 Account No. 1934.055

Page: 1

Claims against Gregory Talbot - Finder

Fees

					Rate	Hours	
02/02/2023	AKM	B180	A101	Review of summons served.	275.00	0.10	27.50
02/08/2023	PR3	B110	A110	Manage data/files - Saving emails to ND	110.00	0.60	66.00
02/15/2023	PR3	B110	A110	Manage data/files - locating and saving emails to ND	110.00	0.50	55.00
03/23/2023	GM	B190	A101	Prepare draft letter regarding entry of default.	100.00	1.50	150.00
04/17/2023	GM	B190	A101	Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	6.00	600.00
04/18/2023	GM	B190	A101	Continue Prepare the following: 1. Letter regarding Clerk's Entry of Default, 2. Request for Clerk's Entry of Default, 3. Randall A. Pulman's Declaration, 4. Motion for Entry of Default, 5. Proposed Order, 6. RAP's Affidavit	100.00	3.00	300.00
04/26/2023	AKM	B190	A101	Review request for clerk's entry of default; finalizing for filing; oversee filing of same.	275.00	0.60	165.00
	RAP	B190	A101	Review and approval of request for entry of clerk's default.	500.00	0.10	50.00

Lowe, Pat (dprt)

Statement No. 236939

Account No 1934.055

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Claims against Gregory Talbot - Finder

					Rate	Hours	
05/01/2023	AKM	B190	A101	Finalize notice letter for clerk's entry of default.	275.00	0.30	82.50
05/02/2023	AKM	B190	A101	Signing and mailing notice letter for clerk's entry of default.	275.00	0.10	27.50
	GM	B190	A101	Continue prepare and amend default motion after Anna's comments.	100.00	2.00	200.00
05/03/2023	AKM	B190	A101	Review of draft motion for default judgment, proposed final judgment, and supporting affidavit.	275.00	0.80	220.00
05/04/2023	GM	B190	A101	Continue prepare and finalize default motions.	100.00	0.50	50.00
05/08/2023	AKM	B190	A101	Voicemail to/from Talbot.	275.00	0.20	55.00
	AKM	B190	A101	Finalize motion for default judgment for Randall A. Pulman approval and filing.	275.00	0.50	137.50
	GM	B190	A101	Continue prepare and finalize default motions; email Anna the same.	100.00	1.00	100.00
05/09/2023	GM	B190	A101	Continue prepare and amend default motion regarding prejudgment interest after Randall A. Pulman's edits.	100.00	0.50	50.00
	RAP	B190	A104	Review of Motion for default judgment; edit of same; office conference with A. MacFarlane and G. Mankotia regarding same.	500.00	0.20	100.00
05/11/2023	GM	B190	A101	Continue prepare and finalize default motions and proposed order for Randall A. Pulman's review; confer with Randall A. Pulman regarding prejudgment interest; made changes after Randall A. Pulman's edits.	100.00	1.00	100.00
05/12/2023	GM	B190	A101	Finalized default motions; confer with Randall A. Pulman regarding same; email MaryAnn the same for filing.	100.00	0.50	50.00
	RAP	B190	A104	Final review and signature of Motion to Default Judgment and affidavit in support			

Lowe, Pat (dprt)

Statement No. 236939
Account No 1934.055
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Claims against Gregory Talbot - Finder

				Rate	Hours	
			of Motion.	500.00	0.30	150.00
05/16/2023	AKM B190	A101	Voicemail from Gregory Talbot (0.1); email to Talbot (0.1).	275.00	0.20	55.00
05/17/2023	AKM B190	A101	Email to Greg Talbot regarding default, hearing, and hiring attorney.	275.00	0.20	55.00
05/30/2023	AKM B190	A101	Emails and phone calls with Greg Talbot regarding potential settlement.	275.00	0.50	137.50
			For Legal Services Rendered		21.20	2,983.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.60	\$500.00	\$300.00
Anna K. MacFarlane	3.50	275.00	962.50
PARA-3	1.10	110.00	121.00
Gaurav Mankotia	16.00	100.00	1,600.00

Total Current Work 2,983.50

Balance Due \$2,983.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	121.00	0.00
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	2835.00	0.00
B100	Administration	2,983.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-76

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May 31, 2023

Invoice No. 236940
 Account No. 1934.056

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Claims against Jack Nace - Finder

Fees

				Rate	Hours	
02/02/2023	AKM B180	A101	Review of summons served.	275.00	0.10	27.50
03/02/2023	AKM B190	A101	Review of Defendant's answer.	275.00	0.20	55.00
04/01/2023	GM B190	A101	Prepare Rule 26 Disclosures and Request for Production of Documents; Review of email correspondence for witness list.	100.00	6.00	600.00
04/07/2023	AKM B190	A101	Review of RFP and initial disclosures.	275.00	0.50	137.50
04/11/2023	AKM B190	A101	Final review of initial disclosures.	275.00	0.10	27.50
	RAP B190	A104	Review and edit of Rule 26 Disclosures and Request for Production of Documents; office conference with G. Mankotia regarding same.	500.00	0.20	100.00
	GM B190	A101	Continue prepare Rule 26 Disclosures and Request for Production of Documents; confer with Randall A. Pulman regarding same.	100.00	2.00	200.00
04/15/2023	GM B190	A101	Final review and editing of Rule 26 Disclosures and Request for Production of Documents.	100.00	0.50	50.00
04/17/2023	AKM B190	A101	Draft Motion to Amend Scheduling Order; oversee filing of same.	275.00	0.60	165.00
04/18/2023	AKM B190	A101	Review of court's order resetting docket call.	275.00	0.10	27.50

Lowe, Pat (dprt)

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Claims against Jack Nace - Finder

					Rate	Hours	
05/01/2023	AKM	B190	A101	Review of initial disclosures from Defendant.	275.00	0.10	27.50
05/10/2023	GM	B190	A101	Searched on westlaw for Proofs of Claim filed by finders demanding jury trial.	100.00	1.00	100.00
05/24/2023	GM	B190	A101	Prepare motion to strike jury demand along with an order and an appendix; arrange finders agreements on netdocs; confer with Randall A. Pulman regarding same.	100.00	3.00	300.00
				For Legal Services Rendered		14.40	1,817.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	0.20	\$500.00	\$100.00
Anna K. MacFarlane	1.70	275.00	467.50
Gaurav Mankotia	12.50	100.00	1,250.00

Total Current Work	1,817.50
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Balance Due	<u>\$1,817.50</u>
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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B180	Avoidance Action Analysis	27.50	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1790.00	0.00
B100	Administration	1,817.50	0.00

Invoices are payable upon receipt.

EXHIBIT'D-77

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May 31, 2023

Invoice No. 236941
 Account No. 1934.057

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Collection of G-Force Technical Judgment

Fees

					Rate	Hours	
02/07/2023	MS	B190	A108	Communicate (other external): Internal communications relating to contact by G-Force Technical president; receive and review email to G-Force Technical president regarding upcoming Rule 2004 Examination	275.00	0.50	137.50
	MS	B190	A101	Plan and prepare for Rule 2004 Examination of G-Force Technical representative.	275.00	1.00	275.00
02/08/2023	MS	B190	A101	Plan and prepare for Rule 2004 Examination; review documents provided by trial counsel in preparation for Rule 2004 Examination.	275.00	1.20	330.00
02/13/2023	MS	B190	A101	Plan and prepare for Rule 2004 Examination.	275.00	1.50	412.50
02/14/2023	MS	B190	A101	Plan and prepare for Rule 2004 Examination of Mr. Geisler.	275.00	2.00	550.00
02/15/2023	MS	B190	A101	Plan and prepare for Rule 2004 examination; gather and compile exhibits; attention to receipt of Zoom link; internal communications in preparation for examination.	275.00	4.00	1,100.00
02/16/2023	MS	B190	A101	Plan and prepare for Rule 2004 Examination; receive and review email			

Lowe, Pat (dprt)

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Collection of G-Force Technical Judgment

					Rate	Hours	
				from Mr. Geisler including various financial documents; internal communications regarding strategy for Rule 2004 Examination in light of new documents; receive and review email from Ms. Jenken regarding attendance for examination; forward video conference link.	275.00	3.60	990.00
	RAP	B190	A104	Review of tax returns and financial information; office conference with M. Swanson regarding same.	500.00	0.50	250.00
02/17/2023	MS	B190	A109	Prepare for and appear/attend Rule 2004 Examination of G-Force Technical; internal communications relating to same; email to Mr. Geisler regarding production of equipment list or other document reflecting specifications for equipment owned by G-Force Technical.	275.00	4.80	1,320.00
02/20/2023	MS	B190	A108	Communicate (other external): Email exchange with court reporter regarding exhibits to Rule 2004 examination of G-Force Technical.	275.00	0.30	82.50
02/22/2023	MS	B190	A104	Review/analyze transcript of G-Force Rule 2004 Examination.	275.00	0.80	220.00
02/27/2023	MS	B190	A108	Communicate (other external): Email to Mr. Geisler regarding status of equipment and its location.	275.00	0.30	82.50
03/01/2023	MS	B190	A105	Communicate (in firm): Confer with Mr. Pulman regarding next steps to liquidation of G-Force Technical assets; email to Mr. Lowe regarding potential seizure of equipment and liquidation of same.	275.00	0.50	137.50
	RAP	B190	A101	Office conference with Marshall Swanson regarding liquidation of equipment.	500.00	0.50	250.00
03/06/2023	MS	B190	A104	Review/analyze equipment list from Mr. Geisler; confer with Trustee regarding			

Lowe, Pat (dprt)

Statement No. 236941
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Collection of G-Force Technical Judgment

					Rate	Hours	
				same; review TLO report to determine if equipment is subject to liens.	275.00	0.70	192.50
03/28/2023	MS	B190	A107	Communicate (other outside counsel): Receive and review email from Mr. Lowe regarding potential auction of G-Force Technical property.	275.00	0.10	27.50
04/04/2023	MS	B190	A108	Communicate (other external): Email exchange with Mr. Geisler regarding age of equipment.	275.00	0.20	55.00
05/08/2023	MS	B190	A105	Communicate (in firm): Attention to issues with sale of equipment due to age.	275.00	0.20	55.00
				For Legal Services Rendered		22.70	6,467.50
Recapitulation							
	<u>Timekeeper</u>				<u>Hours</u>	<u>Rate</u>	<u>Total</u>
	Randall A. Pulman				1.00	\$500.00	\$500.00
	Marshall Swanson				21.70	275.00	5,967.50

Advances

02/24/2023	B110	E115	Deposition transcripts - Lexitas #1410974	1,822.85
03/06/2023	B110	E106	Online research - TransUnion	15.00
			Total Advances	1,837.85
			Total Current Work	8,305.35
			Balance Due	<u>\$8,305.35</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	1837.85
B190	Other Contested Matters (excluding assumption/rejection motions)	6467.50	0.00
B100	Administration	6,467.50	1,837.85

Invoices are payable upon receipt.

EXHIBIT

D-58

**No fees or
expenses in
this matter**

EXHIBIT'D-79

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May 31, 2023

Invoice No. 236942
 Account No. 1934.059

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Claims against American Express Company

Fees

				Rate	Hours	
02/07/2023	WDM B190	A104	Review/analyze American Express Co. answer to complaint and affirmative defenses.	375.00	0.40	150.00
02/15/2023	AKM B190	A101	Review of AMEX initial disclosures.	275.00	0.10	27.50
02/24/2023	AKM B190	A101	Drafting initial disclosures to AMEX.	275.00	0.60	165.00
03/03/2023	AKM B190	A101	Finalizing AmEx disclosures per Randall A. Pulman comments and edits and serving same.	275.00	1.00	275.00
03/13/2023	AKM B190	A101	Email from American Express counsel regarding document request.	275.00	0.10	27.50
	AKM B190	A101	Attention to AMEX document request and email to opposing counsel regarding same.	275.00	0.50	137.50
	RAP B190	A108	Review of e-mail from defense counsel regarding request for bank statements.	500.00	0.10	50.00
03/27/2023	AKM B190	A101	Review email regarding settlement offer.	275.00	0.30	82.50
	AKM B190	A101	Phone call with Randall A. Pulman, W. Drew Mallender, and Frank White regarding settlement offer and numbers.	275.00	0.20	55.00
	RAP B190	A104	Review of offer; telephone conference with opposing counsel regarding information provided; office conference with A. MacFarlane and D. Mallender regarding calculation of avoidance			

Lowe, Pat (dprt)

Statement No. 236942

Account No 1934.059

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Claims against American Express Company

					Rate	Hours	
				transfers.	500.00	1.50	750.00
	WDM	B190	A104	Review/analyze settlement offer and related documents (.3). Meet with Anna MacFarlane regarding same (.2). Meet with Randall A. Pulman and Anna MacFarlane regarding settlement offer; Conference call with AmEx counsel regarding settlement offer (.6).	375.00	1.10	412.50
04/04/2023	RAP	B190	A104	Draft settlement offer to American Express; forward to opposing counsel.	500.00	1.00	500.00
04/05/2023	AKM	B190	A101	Phone calls with Pat Lowe regarding settlement offer and review and analysis of same.	275.00	0.40	110.00
04/19/2023	AKM	B190	A101	Preparing Joint Motion to Amend Scheduling Order; emails with opposing counsel regarding same.	275.00	1.00	275.00
04/24/2023	AKM	B190	A101	Emails with opposing counsel regarding motion to amend scheduling order.	275.00	0.40	110.00
	AKM	B190	A101	Finalize motion to amend scheduling order and oversee filing of same.	275.00	0.20	55.00
04/27/2023	AKM	B190	A101	Review of emails to/from AmEx counsel regarding settlement.	275.00	0.30	82.50
	AKM	B190	A101	Phone conversation with Randall A. Pulman and Pat Lowe regarding AmEx settlement proposal.	275.00	0.20	55.00
	WDM	B190	A104	Attention to settlement counteroffer.	375.00	0.20	75.00
05/01/2023	RAP	B190	A101	Telephone conference with American Express' counsel regarding settlement offers.	500.00	0.20	100.00
05/04/2023	AKM	B190	A101	Emails and phone calls regarding settlement - agreement reached.	275.00	0.50	137.50
	RAP	B190	A101	Confirm settlement at 650 k with A. MacFarlane; review of e-mails regarding same.	500.00	0.50	250.00

Lowe, Pat (dprt)

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Claims against American Express Company

				Rate	Hours	
05/08/2023	AKM B190	A101	Review of file and begin drafting AmEx settlement agreement.	275.00	1.00	275.00
05/09/2023	AKM B190	A101	Continue drafting AmEx settlement agreement.	275.00	0.50	137.50
05/10/2023	AKM B190	A101	Emails to/from AmEx counsel with settlement agreement draft.	275.00	0.30	82.50
	AKM B190	A101	Confer with Randall A. Pulman via email regarding AmEx settlement agreement draft.	275.00	0.10	27.50
	WDM B190	A104	Review proposed settlement agreement.	375.00	0.20	75.00
05/16/2023	AKM B190	A101	Emails with opposing counsel regarding redlined settlement agreement.	275.00	0.20	55.00
05/18/2023	AKM B190	A101	Continue drafting settlement agreement per AmEx counsel comments and edits.	275.00	0.50	137.50
	AKM B190	A101	Email to Pat Lowe with draft settlement agreement and payment form.	275.00	0.20	55.00
	AKM B190	A101	Confer with Randall A. Pulman regarding AmEx settlement agreement and payment form.	275.00	0.10	27.50
05/19/2023	AKM B190	A101	Emails regarding settlement agreement and payment form.	275.00	0.50	137.50
05/30/2023	AKM B190	A101	Confer with Randall A. Pulman regarding AmEx settlement process.	275.00	0.20	55.00
	AKM B190	A101	Phone call Randall A. Pulman, Frank White, and Pat Lowe regarding AmEx settlement process.	275.00	0.30	82.50
	AKM B190	A101	Continue drafting Settlement Agreement and Exhibit A per opposing counsel comments and edits; confer with Randall A. Pulman throughout.	275.00	1.00	275.00
	RAP B190	A104	Office conference with A. MacFarlane regarding settlement agreement and 9019; telephone conference with counsel for Amex and P. Lowe regarding payment logistics.	500.00	0.80	400.00
	RAP B190	A104	Review and signature of wire transfer			

Lowe, Pat (dprr)

Statement No. 236942
Account No 1934.059
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Claims against American Express Company

			form.	Rate 500.00	Hours 0.20	100.00
05/31/2023	AKM	B190	A101 Emails with AmEx counsel regarding settlement agreement.	275.00	0.20	55.00
			For Legal Services Rendered		17.10	5,860.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	4.30	\$500.00	\$2,150.00
W. Drew Mallender	1.90	375.00	712.50
Anna K. MacFarlane	10.90	275.00	2,997.50

Total Current Work 5,860.00

Balance Due \$5,860.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B190	Other Contested Matters (excluding assumption/rejection motions)	5860.00	0.00
B100	Administration	5,860.00	0.00

Invoices are payable upon receipt.

EXHIBIT'D-60

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May 31, 2023

Invoice No. 236943
 Account No. 1934.060

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TuYo v Transamerica Life Insurance Co 5:22-ev-845 WEST

Fees

				Rate	Hours	
02/06/2023	AKM B190	A101	Attention to emails regarding TuYo intervention.	275.00	0.10	27.50
	WDM B190	A108	Email correspondence with Greg Yost regarding Transamerica lawsuit concerning Barry Siegel life insurance policy.	375.00	0.20	75.00
02/07/2023	RAP B190	A108	tc with Pat Lowe re intervention in TuYo lawsuit;	500.00	0.20	100.00
02/27/2023	WDM B190	A104	Review/analyze Subpoena from Transamerica to Trustee.	375.00	0.30	112.50
	RAP B190	A104	Review and receipt of subpoena from life insurance company; calendar of response.	500.00	0.30	150.00
03/02/2023	RAP B190	A101	Review of documents for privilege of documents TUYO proposes to produce to insurance carrier.	500.00	0.30	150.00
03/03/2023	RAP B190	A101	Forward subpoena to counsel in Transamerica suit.	500.00	0.20	100.00
03/07/2023	RAP B190	A108	Telephone conference with J. McKinney regarding subpoena received from Transamerica Life Insurance Company.	500.00	0.50	250.00
03/08/2023	WDM B190	A105	Confer with Randall A. Pulman regarding response to request for production.	375.00	0.20	75.00

Lowe, Pat (dprt)

Statement No. 236943

Account No 1934.060

TuYo v Transamerica Life Insurance Co 5:22-ev-84

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				Rate	Hours	
03/09/2023	WDM B190	A103	Review debtor's files/records for documents responsive to request for production of documents.	375.00	4.00	1,500.00
03/10/2023	WDM B190	A103	Draft/revise response to requests for production.	375.00	1.40	525.00
03/13/2023	WDM B190	A104	Review/analyze data contained in deeproot funds portal/database in connection with response to request for production.	375.00	3.40	1,275.00
	WDM B190	A103	Draft/revise response to request for production.	375.00	0.50	187.50
03/14/2023	WDM B190	A103	Draft/revise response to request for production.	375.00	1.70	637.50
	WDM B190	A105	Meet with Randall A. Pulman, review response to request for production. Email draft to Pat Lowe for review.	375.00	0.20	75.00
	RAP B190	A108	Review and edit of Response to TransAmerica subpoena; office conference with D. Mallender regarding same.	500.00	0.60	300.00
03/15/2023	WDM B190	A105	Meet with Randall A. Pulman regarding comments to response to request for production. Meet with Leslie Hyman regarding same.	375.00	0.30	112.50
	AKM B190	A101	Review draft RFP response in TransAmerica suit.	275.00	0.30	82.50
	RAP B190	A108	Review of draft of response to TransAmerica subpoena.	500.00	0.30	150.00
	LSH B190	A103	Draft/revise responses to document requests in subpoena.	450.00	0.30	135.00
03/16/2023	WDM B190	A105	Meet with Randall A. Pulman regarding response to request for production.	375.00	0.30	112.50
	WDM B190	A105	Meet with Ben Wulfe regarding document search in connection with response to request for production. Review original complaint and court docket.	375.00	0.50	187.50
	WDM B190	A104	Review/analyze documents to be			

Lowe, Pat (dprt)

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Account No 1934.060

TuYo v Transamerica Life Insurance Co 5:22-ev-84

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					Rate	Hours	
				produced. Revise response to request for production.	375.00	4.10	1,537.50
	PR3	B110	A110	Manage data/files - Searching for documents relating to Transamerica and Barry Siegal for subpoena	110.00	1.00	110.00
	PR3	B110	A110	Manage data/files - reviewing and preparing documents for production	110.00	2.00	220.00
	RAP	B190	A108	Office conference with D. Mallender regarding response to subpoena; review of sampling of documents found on server.	500.00	1.00	500.00
03/17/2023	RAP	B190	A107	Review and edit of Response to Subpoena; review of documents gathered in response.	500.00	0.50	250.00
	WDM	B190	A103	Draft/revise response to request for production.	375.00	1.30	487.50
	WDM	B190	A105	Meet with Ben Wulfe regarding production of data contained in deeproot funds portal. Email correspondence with Chris Turner regarding same.	375.00	0.50	187.50
	WDM	B190	A108	Communicate with Greg Murray regarding payments to Transamerica. Email to Jason McKinnie regarding document production.	375.00	0.50	187.50
	WDM	B190	A105	Meet with Randall A. Pulman and Anna MacFarlane regarding strategy.	375.00	0.20	75.00
03/21/2023	WDM	B190	A107	Communicate (other outside counsel) with Jason McKinnie regarding Transamerica suit and response to request for production.	375.00	0.60	225.00
	WDM	B190	A103	Draft/revise response to request for production. Confer with Randall A. Pulman regarding same.	375.00	0.70	262.50
	RAP	B190	A105	Confer with W. Drew Mallender regarding response to request for production.	500.00	0.20	100.00
03/22/2023	WDM	B190	A104	Review additional documents to be produced in response to request for production (.3). Meet with Ben Wulfe regarding production of documents (.2).	375.00	0.50	187.50

Lowe, Pat (dprt)

Statement No. 236943

Account No 1934.060

TuYo v Transamerica Life Insurance Co 5:22-ev-84

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				Rate	Hours	
03/23/2023	WDM B190	A104	Review/analyze documents to be produced in response to request for production. Meet with MaryAnn Villa concerning service of response to request for production.	375.00	1.40	525.00
	RAP B190	A105	Review of documents for production; review of response to subpoena; office conference with D. Mallender regarding same.	500.00	1.00	500.00
	WDM B190	A105	Confer with Randall A. Pulman regarding document production.	375.00	3.00	1,125.00
03/24/2023	RAP B190	A104	Final review and approval of response to subpoena; review of documents to be produced; instructions to staff regarding same.	500.00	0.50	250.00
	WDM B190	A104	Finalize response to request for production and prepare for filing.	375.00	0.40	150.00
03/27/2023	PR3 B110	A110	Manage data/files - Preparing documents for production	110.00	1.00	110.00
03/31/2023	WDM B190	A105	Confer with Randall A. Pulman regarding answers to Transamerica's requests for production of documents.	375.00	0.20	75.00
			For Legal Services Rendered		36.70	13,385.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	5.60	\$500.00	\$2,800.00
W. Drew Mallender	26.40	375.00	9,900.00
Anna K. MacFarlane	0.40	275.00	110.00
PARA-3	4.00	110.00	440.00
Leslie Hyman	0.30	450.00	135.00

Total Current Work 13,385.00

Balance Due \$13,385.00

Lowe, Pat (dprt)

Statement No. 236943

Account No 1934.060

TuYo v Transamerica Life Insurance Co 5:22-ev-84

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Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	440.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	12945.00	0.00
B100	Administration	13,385.00	0.00

Invoices are payable upon receipt.

EXHIBIT'D-61

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May 31, 2023

Invoice No. 236944
Account No. 1934.061

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Claims against Carlile, Patchen & Murphy, LLP

Previous Balance \$27.50

Balance Due \$27.50

Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
27.50	0.00	0.00	0.00	0.00	0.00

Invoices are payable upon receipt.

EXHIBIT D-62

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May 31, 2023

Invoice No. 236945
 Account No. 1934.062

Page: 1

Claims against JP Morgan Chase

Fees

					Rate	Hours	
03/28/2023	RAP	B190	A104	Review of summary of case for Lowe; signature of same.	500.00	0.20	100.00
04/07/2023	AKM	B190	A101	Draft adversary complaint against JP Morgan Chase and supporting exhibits.	275.00	2.00	550.00
04/19/2023	AKM	B190	A101	Continue drafting adversary complaint; finalize same for filing.	275.00	0.80	220.00
	AKM	B190	A101	Confer with Randall A. Pulman regarding adversary complaint.	275.00	0.10	27.50
	RAP	B190	A101	Review and signature of original complaint.	500.00	1.00	500.00
04/28/2023	AKM	B190	A101	Return of service for JP Morgan.	275.00	0.30	82.50
	RAP	B190	A101	Reviewing of return of service.	500.00	0.10	50.00
	RAP	B190	A108	Review and signature of return of summons.	500.00	0.20	100.00
05/22/2023	RAP	B190	A104	Review of Motion to Dismiss.	500.00	0.30	150.00
	LSH	B120	A102	Legal research regarding effect of filing an answer subject to a motion to dismiss.	450.00	1.10	495.00
				For Legal Services Rendered		6.10	2,275.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Randall A. Pulman	1.80	\$500.00	\$900.00
Anna K. MacFarlane	3.20	275.00	880.00
Leslie Hyman	1.10	450.00	495.00

Advances

04/20/2023	B110	E124	Filing Fee - Pay.gov - Adv Proc Comp	350.00
			Total Advances	350.00
			Total Current Work	2,625.00
			Balance Due	<u>\$2,625.00</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B110	Case Administration	0.00	350.00
B120	Asset Analysis and Recovery	495.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1780.00	0.00
B100	Administration	2,275.00	350.00

Invoices are payable upon receipt.